

Think & Do Data Protection Policy

Last Updated	November 2024
Updated by	Ian Grant, Director
Discussed at Board meeting	24/11/2024

Definitions

Company	Think & Do Social and Environmental Action Ltd
GDPR	means the General Data Protection Regulation.
DPA	Means Data Protection Act 2018
Personal data	includes any information relating to an identified or identifiable natural living person.
Processing	Anything that is done with personal data, including collection, storage, use, disclosure, and deletion.
Responsible Person	means Ned Collier

Register of systems Record of Processing Activities	means a register of all systems or contexts in which personal data is processed by the Company.
Sensitive personal data	includes personal data about a person's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic, biometric, physical or mental health condition, sexual orientation or sexual life. It can also include data about criminal offences or convictions. Sensitive personal data can only be processed under strict conditions.

1. Data protection principles

The Company is committed to processing data in accordance with its responsibilities under the GDPR and the DPA and is guided by the data protection principles set out in Article 5 of the GDPR which requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and

f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

2. General provisions

a. This policy applies to all the processing of personal data by the Company including by contractors and processors.

b. All directors, staff and volunteers are responsible for complying with this policy and in particular:

- maintaining personal data securely and not disclosing it without a lawful reason; and
- reporting any suspected or actual data breaches to the Responsible Person.

c. The Company shall register with the Information Commissioner's Office as an organisation that processes personal data.

d. The Company shall agree a Responsible Person who shall take responsibility for ensuring compliance with this Policy.

e. This policy shall be reviewed at least annually.

3. Individual's rights

Individuals have rights in relation to their personal data. They are:

- The right to be informed about the collection and use of their personal data.
- The right to access and receive a copy of their personal data, and other supplementary information.
- The right to have inaccurate personal data rectified or completed if it is incomplete.
- The right to have personal data erased.
- The right to request the restriction or suppression of their personal data.
- The right to obtain and reuse their personal data for their own purposes across different services.
- The right to object to the processing of their personal data in certain circumstances.
- The right, in some circumstances, to object to automated decisions being made about them including profiling.

When an individual exercises one of their rights, the company will respond within the statutory deadline imposed by GDPR, this is usually one calendar month.

4. Lawful, fair and transparent processing

- a.** The Company is committed to transparent, lawful, and fair proportionate processing of personal data. This includes all personal data we process about volunteers, investors, supporters, staff or those who work or interact with us. The Company does not process sensitive personal data.
- b.** To ensure its processing of data is lawful, fair and transparent, the company shall maintain a Register of Systems Record of Processing Activities.
- c.** The Register of Systems Record of Processing Activities shall be reviewed at least annually.
- d.** The company shall publish privacy information on its website and within any forms or letters sent to individuals.

5. Lawful purposes

- a.** All data processed by the Company must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests (see ICO guidance for more information).
- b.** The Company shall note the appropriate lawful basis in the Register of Systems Record of Processing Activities.
- c.** Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- d.** Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the company's systems.

6. Data minimisation

- a.** The company shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

7. Accuracy

- a.** The company shall take reasonable steps to ensure personal data is accurate.
- b.** Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

8. Archiving / removal

- a. To ensure that personal data is kept for no longer than necessary, the company shall put in place a Retention Schedule an archiving policy for each area in which personal data is processed and review this Schedule process at least annually.
- b. The Retention Schedule archiving policy shall consider what data should/must be retained, for how long, and why.

8. Security

- a. The company shall ensure that personal data is stored securely using modern software that is kept - up-to-date.
- b. Appropriate back-up and disaster recovery solutions shall be in place.
- c. When personal data is deleted this should be done safely such that the data is irrecoverable.
- d. No new systems or significantly new ways of working will be introduced without a Data Protection Impact Assessment being carried out.
- e. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- f. The company will not transfer personal data to people or organisations situated in countries without adequate protection and without firstly having advised the individual.

9. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data, the Company shall promptly assess the risk to people’s rights and freedoms and if appropriate report this breach to the ICO within the required deadline, currently 72 hours (more information on the ICO website).

(NEW) Appendix 1 - Record of Processing Activities

Think & Do is the Controller of the personal data set out below.

Category of	Data held	Source of	Location and	Transfer to third
-------------	-----------	-----------	--------------	-------------------

personal data		date / Lawful basis	retention schedule	countries
Beneficiaries	Name, address, email, phone	Data provided directly. Held on a Legitimate Interest basis.	Data held in Google Workspace on a restricted access basis. Data retained for 12 months after the end of a project to enable us to aggregate and report to funders.	Yes - Google servers are in the US, South America and Asia. Standard Contractual Clauses agreed to ensure protection for transfer outside the EU.
Supporters	Name, email address	Data provided directly. Held on a Consent basis.	Data held on Excel and Mailchimp. Supporters opt in to receive Think & Do newsletter via Mailchimp and can unsubscribe.	Yes - Mailchimp servers are in the US. Standard Terms of Use set out the protections for transfer.
Volunteers	Name, email, phone number, professional interest, employer	Data provided directly. Held on a Legitimate Interest basis.	Data held in Google Workspace on a restricted access basis. Data retained for as long as the volunteer wants to be involved. Data shared with other volunteers in relation to relevant projects.	Yes
Grant bodies and funders	Name, address, email, bank	Data provided directly.	Data held on Excel and in Google	Yes

	details, investment amount	Held on a Legitimate Interest basis.	Workspace.	
Directors	Name, address, email, bank details, date of birth, DBS check	Data provided directly. Held on a Legal Obligation basis.	Data held in Google Workspace on a restricted access basis. Data retained for the period of directorship. No data on criminal convictions is held.	Yes

(NEW) Appendix 2 - Privacy Notice

Think & Do Social and environmental Action Ltd Customer Privacy Notice

This privacy notice tells you what to expect us to do with your personal information.

- Contact details
- What information we collect, use, and why
- Lawful bases and data protection rights
- Where we get personal information from
- How long we keep information
- Who we share information with
- Sharing information outside the UK
- How to complain

Contact details

Email: ned@thinkanddocamden.org.uk

What information we collect, use, and why

We collect the following information from individuals:

- Names and contact details
- Addresses
- Payment details (including bank information for transfers)

We use this information to provide goods and services related to social justice and environmental action, to receive donations or funding and to organise fundraising activities and to provide updates and marketing information to our supporters and investors.

Lawful bases and data protection rights

Under UK data protection law, we must have a “lawful basis” for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO’s website.

Which lawful basis we rely on may affect your data protection rights which are in brief set out below. You can find out more about your data protection rights and the exemptions which may apply on the ICO’s website:

- Your right of access - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. You can read more about this right here.
- Your right to rectification - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. You can read more about this right here.
- Your right to erasure - You have the right to ask us to delete your personal information. You can read more about this right here.
- Your right to restriction of processing - You have the right to ask us to limit how we can use your personal information. You can read more about this right here.
- Your right to object to processing - You have the right to object to the processing of your personal data. You can read more about this right here.

- Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. You can read more about this right [here](#).
- Your right to withdraw consent – When we use consent as our lawful basis you have the right to withdraw your consent at any time. You can read more about this right [here](#).

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for the collection and use of your data

Our lawful bases for collecting and using personal information to provide services are:

* Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:

*Think & Do collects and processes data to support people in the community and organisations to help with social justice and environmental action.

Our lawful bases for collecting or using personal information to receive donations or funding and organise fundraising activities are:

* Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:

Our lawful bases for collecting or using personal information for supporter updates or marketing purposes are:

*Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

Where we get personal information from

- Directly from you
- Publicly available sources

How long we keep information

We keep information about:

- Individuals and organisations who receive goods and services from Think & Do for 24 months until reviewing
- The financial supporters until they withdraw their consent.
- Freelance employees

Who we share information with

We share personal information with:

- Insurance companies, brokers and other intermediaries
- Professional advisors
- Relevant regulatory authorities
- Suppliers and service providers
- Organisations we're legally obliged to share personal information with

Sharing information outside the UK

Where necessary, we may transfer personal information outside of the UK. When doing so, we comply with the UK GDPR, making sure appropriate safeguards are in place.

For further information or to obtain a copy of the appropriate safeguard for any of the transfers below, please contact us using the contact information provided above.

Organisation name: Google Workspace

Category of recipient: Storage provider

Country the personal information is sent to: US, South America and Asia

How the transfer complies with UK data protection law: Addendum to the EU Standard Contractual Clauses (SCCs)

Organisation name: The Rocket Science Group (Mailchimp)

Category of recipient: Marketing services

Country the personal information is sent to: US

How the transfer complies with UK data protection law: Addendum to the EU Standard Contractual Clauses (SCCs)

How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>

Last updated: November 24 2024