FOTHCP DATA PROTECTION POLICY

FOTHCP will abide by the General Data Protection Regulation at all times. We have notified the Information Commissioner’s Office that we handle personal data and why.

We undertake to –

**Keep data low** – We aim to collect and retain data on individuals only as much as we need to in order to satisfy governance, and administration of membership, supporters, and volunteers, and needs of local authority and government bodies (an example being proof of diversity and equality monitoring). We will only collect and retain information for where we have a legitimate interest to do so.

**Keep data secure** – We aim to give all personal data appropriate levels of protection where we have legal responsibility for the data. Responsibility extends to any third-parties (e.g. online providers of services, printers and other charities we interact with). FOTHCP recognises that it is the controller for data gathered even in scenarios where we do not directly process the data.

**Keep data private** – We undertake never to release data to third parties without express written permission of each individual concerned.

**Give fair processing notice** – We undertake to outline to each individual why we are requesting data exactly what is going to happen to their information, and how it is going to be used.

**Keep data only as long as we need to** – We undertake to destroy data safely once it is no longer required for charity purposes, and to set limits to perceived usefulness at time of collection.

**Keep use of data within individual’s wishes** – We undertake to remind each individual that they can opt out of mailings at any time.

**Show accountability for data** – We will ensure that all personal data has an accountable owner. Overall ownership of personal data gathered by FOTHCP rests with the trustees.

**Keep a register of data breaches** – FOTHCP will maintain a register of personal data gathered; the register will cover accountable owner, security controls applied and description of the impact of a breach. Security controls will cover people, policy, processes, physical and IT controls and will evidence that we have implemented security by design.

**Identify key processes** – FOTHCP will maintain processes that cover the following areas of GDPR:

- The right to object to data that is incorrect and have it rectified
• The right to object to data being held inappropriately gathered, stored and used by FoTCHP and for it to be erased. This extends to the right of individuals to be ‘forgotten’ and all data removed.
• The right to be notified in the event of an actual or there is a reasonable assumption of a suspected breach.
• The right to access personal data for the individual making the request or for which they have parental or guardianship responsibilities.
• The right to withdraw consent over the usage of personal data.

Location of data – All data will be held within the European Economic Area or a country recognised under the ‘Safe Harbour’ scheme.¹

Should you have any queries about our data protection policy then please contact us at –

Friends of Tower Hamlets Cemetery Park
Soanes Centre, Tower Hamlets Cemetery Park
Southern Grove
London, E3 4XP

contact@fothcp.org
020 8983 1277

¹ The Safe Harbor scheme sets out a framework of data protection standards which allow the free flow of personal data from EEA data controllers to US and other signatory countries which have joined the scheme.