

Argos Hill Windmill Trust Limited Data and Privacy Policy





1. Overview

- 1.1 Argos Hill Windmill Trust Limited (the Trust) keeps certain information about its Trustees, volunteers, financial supporters, suppliers and contractors in order to effectively manage the restoration, maintenance and repair of Argos Hill Windmill (the Mill).
- 1.2 To comply with the law, information must be collected and used fairly, stored safely and not disclosed to any other person unlawfully. The following policy sets out how this will be achieved.

2. Definitions

- 2.1 Personal data is information about identifiable, living individuals held on computer or in manual filing systems.
- 2.2 The Data Controller is Richard Howes and the Trust is ultimately responsible for the policy's implementation.
- 2.3 The Data Protection Officer is a nominated member of the Trust responsible for reviewing and enforcing the Data Protection Policy.

3. The Policy

- 3.1 In keeping information about its Trustees, volunteers, financial supporters, suppliers and contractors, the Trust will follow the six Data Protection Principles set out in the General Data Protection Regulation (GDPR) effective from 25 May 2018, which are summarised below:
 - 3.1.2 to process data fairly and lawfully and transparently
 - 3.1.3 to collect data only for a specified, explicit and legitimate purpose
 - 3.1.4 to collect and store data only to the extent which is adequate, relevant and not excessive.



- 3.1.5 to ensure data is accurate and up to date
- 3.1.6 to keep the data for no longer than is necessary.
- 3.1.7 to ensure the integrity, confidentiality and security of the data by taking all reasonable measures against unauthorized or unlawful processing, and against accidental loss, destruction, or damage

- 3.2 Any Trustee, who processes or uses any personal information in the course of their duties, will ensure that these principles and the following procedures are followed at all times. Guidance notes to aid with adherence to the six principles above have been included in Appendix 1.

- 3.3 When the Trust has cause to obtain personal data (such as names, addresses, phone numbers, email addresses and financial details) from Trustees, volunteers, financial supporters, suppliers and contractors this data will be obtained, stored and processed solely to assist the Trust in the efficient running and financial management of the restoration, repair and maintenance of the Mill.

- 3.4 When personal data is requested from a new or existing Trustee, volunteer or financial supporter, they will be given an explanation of how their personal data will be used. Written consent will be required to collect and store this data.

- 3.5 The Trustees', volunteers' or financial supporter's personal data will not be passed on to anyone outside the Trust without explicit consent from them unless there is a legal duty of disclosure under other legislation.

- 3.8 All Trustees will have access to each other's personal data and volunteers' personal data. Only the Chairman/Treasurer will have access to financial supporters' personal data.

- 3.9 All Trustees will be made aware of this Privacy and Data Protection policy and their obligation not to disclose personal data to anyone who is not authorised to have it and they will be asked to sign a declaration confirming their compliance to the policy.

- 3.10 All Trustees, volunteers and financial supporters of the Trust will be supplied with a copy of any of their personal data held by the Trust, within 30 days of the request, if a request is made.

4. Accuracy and Longevity

- 4.1 The Trust will take reasonable steps to keep personal data up to date and accurate and make corrections in a timely fashion. Trustees', volunteers' and financial supporters' personal and financial data may be kept for at least for 6 years after they cease to be a trustee, volunteer or financial supporter of the Trust.

- 4.2 If a request is received from an individual to destroy their records, the Trust will remove their details from its database and request that all Trustees holding paper or electronic details of that individual destroys them. This work will be carried out by the Data Protection Officer. It is the responsibility of the Trust to inform the Data Protection Officer if such a request is received.





5. Storages

- 5.1 Personal data is kept in paper-based systems and on a password-protected computer system. Every effort will be made to ensure that paper-based data are stored in organised and secure systems.

6. Review of this policy

- 6.1 This Privacy and Data Protection Policy will be reviewed every three years by the Data Protection Officer to ensure it remains progressive and reflective of the UK legislation.
- 6.2 Any recommended changes to the policy, appended policies, procedures and forms and will be submitted to the Trustee members for approval.

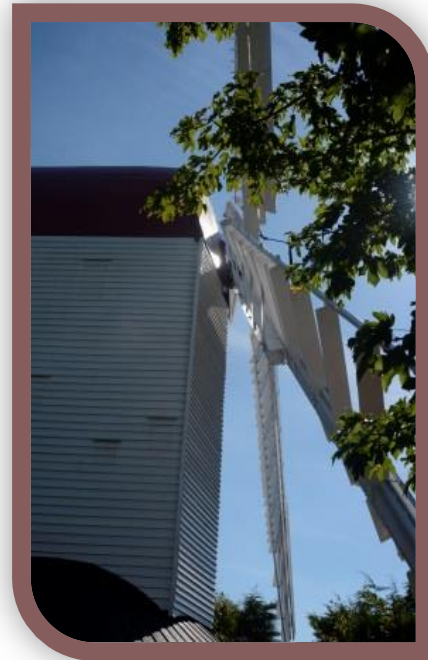
Date policy adopted: 24 May 2018

Date for review: 23 May 2021



APPENDIX 1

This outlines the practical ways we are adhering to the six principles of GDPR (effective from 25 May 2018).



1. Process data fairly and lawfully and transparently

- 1.1 We will let all new and existing Trustees, volunteers and financial supporters know what data we hold about them and why it is being held and collect their written permission to hold this data for the reasons outlined in the policy.
- 1.2 The privacy statement used for the above is in Appendix 2

2. Collect data only for a specified, explicit and legitimate purpose

- 2.1 to process the collection of grants, awards, and donations and to apply them in the restoration, maintenance and repair of the mill
- 2.2 to inform trustees of meetings
- 2.3 to invite the Friends of Argos Hill Windmill, volunteers, financial supporters to fund raising events and initiatives and to assist with restoration, maintenance and repair of the Mill.
- 2.4 to enable the processing of invoices and receipts

3. Purpose limitation

- 3.1 We will only collect data for the reasons given above and will not use the data for activities that fall outside those that will further the restoration, maintenance and repair of the Mill.

4. Collect and store data only to the extent which is adequate, relevant and not excessive.



- 4.1 The information we collect are names, addresses, telephone numbers, email addresses and financial details.
- 4.2 The bank details of financial supporters are kept securely by the Chairman of the Trust.

5. Ensure data is accurate and up to date

- 5.1 We will review the data held annually.
- 5.2 We will delete data from our computer records or burn or shred any paper copies of data held on anyone who, for whatever reason, informs us that they do not wish to be informed of, or take part in our activities or that we are informed has moved away or died.

6. Not keep the data for longer than is necessary

- 6.1 We will adhere to number 5 above and in addition if we organize an event which is a “one off” event we will not keep the details of attendees unless they have given permission to do so.
- 6.2 We will destroy the data according to 5.2

7. Technical and organisational measures against unauthorized or unlawful processing, and against accidental loss, destruction, or damage

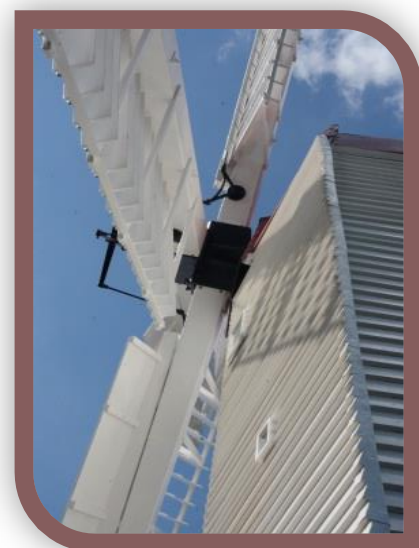
- 7.1 We will keep paper records in a safe place.
- 7.2 Computer data records are held on password protected computers. The file that contains the contact details of all our Trustees, volunteers and financial supporters is also password protected and is only accessible by the Chairman/Treasurer.
- 7.3 If our computer systems are compromised in any way, the data protection officer will be informed and all the individuals whose data has been compromised will be informed.

APPENDIX 2 - PRIVACY STATEMENT WORDING

In accordance with the new General Data Protection Regulations (GDPR) which come in to force on 25 May 2018, we are required to seek permission to store any personal data held about you and to allow us to contact you in the future.

What data we hold

Personal data that we hold are names, addresses, telephone numbers email addresses and financial details. We hold bank details of financial supporters who pay by bank transfer, direct debit and standing order. These are stored securely on computer which is password protected.



Why we hold personal data

We hold this information in order to further the restoration, maintenance and repair of the Mill.

How it is stored

The data stored on paper is kept in a secure place. Computer data records are held on password protected computers. The file that contains the contact details of all our clients and volunteers is also password protected and is only accessible by the Chairman/Treasurer.

What we will NOT do with your data

Your data will not be passed onto to any third party without your permission.
Your data will not be used for any purpose other than for the effective restoration, maintenance and repair of the Mill.

Privacy Policy

Our Privacy and Data Protection Policy can be accessed via the Friends of Argos Hill website: www.argoshillwindmill.org.uk or a hard copy can be obtained from the Chairman of the Trust Mr Geoffrey Daughtrey, Post Mill House, Argos Hill Road, Rotherfield East Sussex, TN6 3QF.

You can request to see the personal data we hold about you at any time.

We will regularly review the data we hold and update it accordingly and also remove your data from our records if requested.

If you grant us permission to store your personal data and use it to contact you about your membership, meetings and forthcoming events, please tick, sign, date and tear off the slip below and return to Geoffrey Daughtrey by one of these methods:

Scan this agreement and email to: gwd1@hotmail.co.uk

Post to Geoffrey Daughtrey, Post Mill House, Argos Hill Road, Rotherfield, East Sussex, TN6 3QF

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I (name)..... give permission for the Friends of Argos Hill Windmill Committee to keep my name, address, telephone number, email address and financial information for six years

I have read the privacy statement above.

Signed:.....Print Name.....

Date.....

