



Data Protection and Privacy Policies

Approved by the Trustees on 23 August 2021

Data Protection and Privacy Policies

Purpose

This documents contains the following policies:

- Data Protection Policy -covering compliance with the Data Protection Act 2018
- Privacy Policy – protecting the privacy of individuals whose data we hold.

Data Protection Policy

1. Data protection principles

Hay2 Timbuktu is committed to processing data in accordance with its responsibilities under the Data Protection Act 2018 (“DPA”).

DPA requires that personal data shall be:

- processed lawfully, fairly and in a transparent manner in relation to individuals.
- 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.
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- 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.
- 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 DPA in order to safeguard the rights and freedoms of individuals.
- 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.

The DPA also requires that personal data shall:

- take into account people’s rights.
- not be transferred to countries that do not have the same level of data protection.

These requirements are addressed in our Privacy Policy.

2. General provisions

- This policy applies to all personal data processed by Hay2Timbuktu.

- The Responsible Person shall take responsibility for Hay2Timbuktu's compliance with this policy.
- This policy shall be reviewed at least annually.
- Hay2Timbuktu shall periodically review whether it is exempt from the requirement to register with the Information Commissioner's Office. If it is not exempt, it will register as an organisation that processes personal data.

3. Lawful, fair and transparent processing

- To ensure its processing of data is lawful, fair and transparent, Hay2Timbuktu shall maintain a record of the systems on which it records personal data.
- This record shall be reviewed at least annually.
- Individuals have the right to access their personal data and any such requests made to the Hay2Timbuktu shall be dealt with in a timely manner.

4. Lawful purposes

- All data processed by Hay2Timbuktu 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).
- Hay2Timbuktu shall note the appropriate lawful basis in the record of systems.
- Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- 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 Hay2Timbuktu's systems.

5. Data minimisation

- The Hay2Timbuktu shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

6. Accuracy

- Hay2Timbuktu shall take reasonable steps to ensure personal data is accurate.
- 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.

7. Archiving / removal

- To ensure that personal data is kept for no longer than necessary, Hay2Timbuktu

shall put in place an archiving policy for each area in which personal data is processed and review this process annually.

- The archiving policy shall consider what data should/must be retained, for how long, and why.

8. Security

- Hay2Timbuktu shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- 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.
- When personal data is deleted this should be done safely such that the data is irrecoverable.
- Appropriate back-up and disaster recovery solutions shall be in place.

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 Hay2Timbuktu shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO (more information on the ICO website).

Privacy Policy

This Privacy Policy applies to information Hay2Timbuktu collects about individuals who interact with it. It explains what personal information we collect and how we use it.

If you have any comments or questions about this notice, feel free to contact us at info@hay2timbuktu.org.

1. Personal data that we process

The following table explains the types of data we collect and the legal basis, under current data protection legislation, on which this data is processed.

Purpose	Data (key elements)	Basis
Enquiring about our organisation and its work	Name, email, message	Legitimate interests - it is necessary for us to read and store your message so that we can respond in the way that you would expect.
Subscribing to email updates about our work	Name, email	Consent - you have given your active consent
Making a donation	Name, email, address, payment information	Legitimate interests - this information is necessary for us to fulfil your intention of donating money and your expectation of receiving a confirmation message.
Signing up as a friend	Name, email	Contract - by paying your membership fees you have entered into a contractual relationship with us.
Website functionality	Website activity collected through cookies	Legitimate interests - it is necessary for us to store a small amount of information, usually through cookies, to deliver functionality that you

		would expect.
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2. How we use your data

We will only use your data in a manner that is appropriate considering the basis on which that data was collected, as set out in the table at the top of this policy.

For example, we may use your personal information to:

- reply to enquiries you send to us;
- handle donations or other transactions that you initiate;
- where you have specifically agreed to this, send you marketing communications by email relating to our work which we think may be of interest to you.

3. When we share your data

We will only pass your data to third parties in the following circumstances:

- you have provided your explicit consent for us to pass data to a named third party.
- we are using a third party purely for the purposes of processing data on our behalf and we have in place a data processing agreement with that third party that fulfils our legal obligations in relation to the use of third party data processors.
- we are required by law to share your data.

In addition, we will only pass data to third parties outside of the EU where appropriate safeguards are in place as defined by Article 46 of the General Data Protection Regulation.

4. How long we keep your data

We take the principles of data minimisation and removal seriously and have internal policies in place to ensure that we only ever ask for the minimum amount of data for the associated purpose and delete that data promptly once it is no longer required.

5. Rights you have over your data

You have a range of rights over your data, which include the following:

- Where data processing is based on consent, you may revoke this consent at any time and we will make it as easy as possible for you to do this (for example by putting ‘unsubscribe’ links at the bottom of all our marketing emails).
- You have the right to ask for rectification and/or deletion of your information.
- You have the right of access to your information.

- You have the right to lodge a complaint with the Information Commissioner if you feel your rights have been infringed.

A full summary of your legal rights over your data can be found on the Information Commissioner's website here: ico.org.uk/

If you would like to access the rights listed above, or any other legal rights you have over your data under current legislation, please get in touch with us.

Please note that relying on some of these rights, such as the right to deleting your data, will make it impossible for us to continue to deliver some services to you. However, where possible we will always try to allow the maximum access to your rights while continuing to deliver as many services to you as possible.

6. Modifications

We may modify this Privacy Policy from time to time and will publish the most current version on our website. If a modification meaningfully reduces your rights, we'll notify people whose personal data we hold and is affected.