



GLOBAL CHALLENGE (GC) DATA PROTECTION POLICY

Definitions

Charity	means [Global Challenge], a registered charity.
GDPR	means the General Data Protection Regulation.
Register of Systems	means a register of all systems or contexts in which personal data is processed by the Charity.

1. Data protection principles

The Charity is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR 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 personal data processed by the Charity.
- b. The trustees will take responsibility for the Charity's ongoing compliance with this policy.
- c. This policy shall be reviewed at least biennially.
- d. The Charity is exempt from the need to register with the Information Commissioner's Office as an organisation that processes personal data, as it is only processing data for non-profit purposes.

3. Lawful, fair and transparent processing

- a. Individuals have the right to access their personal data and any such requests made to the charity shall be dealt with in a timely manner.

4. Lawful purposes

- a. All data processed by the charity 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. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- c. 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 Charity's systems.

5. Data minimisation

- a. The Charity shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- b. In order to comply with data protection legislation we store:

Information we collect	Why it is used	What system it is held on
Supporter's name, address or email address	To update our supporters about up coming events and to share latest news	Paper copies Database on an encrypted memory stick held by the secretary
Email addresses in 'Block Sender' format on GC's outlook email facility. Care is taken when contacting groups of supporters to use 'BCC' to ensure confidentiality		GC's outlook email facility is available to the secretary and treasurer and other trustees as appropriate
Gift Aid agreement details	A requirement for the Tax office	Hard copies Restricted access on

		GC's Google Drive Treasurer and Accountant
Information about donors and their standing orders	Opportunities to send thank you letters and updates	A database accessed only by the Treasurer and Accountant
Details of donations paid in are noted on the paying in book if relevant to accounting		Banked and kept by the Treasurer or other person nominated by the Trustees
Bank statements	A requirement for accounting purposes	Online access by Treasurer and signatories to Barclays GC account

6. Accuracy

- a. The Charity 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.

7. Archiving / removal

- a. To ensure that personal data is kept for no longer than necessary, the Charity shall delete all records securely.

8. Security

- a. The Charity shall ensure that personal data is stored securely using appropriate software and hardware.
- b. 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.
- c. When personal data is deleted this should be done safely such that the data is irrecoverable.

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 Charity 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](#)).

You can also refer to our Privacy Policy October 2023 by clicking here [GC Privacy Policy](#)

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Policy Agreed & Adopted: October 2023

By the GC Trustees

Date: 12 October 2023 trustees meeting (Point 5.3 on the minutes)

To be reviewed biennially thereafter.