

Data Protection Policy May 2018

This policy sets out our commitment to protecting personal data and how that commitment is implemented in respect of the collection and use of personal data.

As a registered charity, Alzheimer Café UK is fully committed to comply with the General Data Protection Regulation (GDPR), which comes into force on 25 May 2018. The GDPR applies to all organisations that process data relating to employers, volunteers, customers, contractors and clients. It sets out principles which should be followed by those who process data; it also gives new and extended rights to those whose data is being processed.

We fully endorse and adhere to the eight principles of data protection, as set out in the Article 5 of the GDPR:

1. Data must be processed lawfully, fairly and in a transparent manner in relation to individuals.
2. Data must be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
3. Data must be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
4. Data must be 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.
5. Data must be 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.
6. Data must be 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.
7. Data must be kept secure by the Data Controller who takes appropriate technical and other measures to prevent unauthorised or unlawful processing or accidental loss or destruction of, or damage to, personal information.
8. Shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal information

These principles must be followed at all times when processing or using personal information.

Therefore, through appropriate management and strict application of criteria and controls, Alzheimer Café UK will:

- observe fully the conditions regarding the fair collection and use of information including the giving of consent
- meet its legal obligations to specify the purposes for which information is used
- collect and process appropriate information only to the extent that it is needed to fulfil our operational needs or to comply with any legal requirements
- ensure the quality of information used
- ensure that the information is held for no longer than is necessary
- ensure that the rights of people about whom information is held can be fully exercised under the GDPR (i.e. the right to be informed that processing is being undertaken, to access

- one's personal information; to prevent processing in certain circumstances, and to correct, rectify, block or erase information that is regarded as incorrect)
- take appropriate technical and organisational security measures to safeguard personal information
- publicise and abide by individuals' right to appeal or complain to the Information Commissioner's Office (ICO) in the event that agreement cannot be reached in a dispute regarding data protection
- ensure that personal information is not transferred abroad without suitable safeguards.

Data Controller

The designated Data Controller, Hilary Dyce, will deal with day-to-day matters. Any individual who considers that the policy has not been followed in respect of personal data about himself or herself should raise the matter with the above person.

Volunteers

We keep personal data about our volunteers for operational purposes. In addition, all volunteers are responsible for:

- reading and complying with this policy
- checking that any information that they provide to us is accurate and up to date
- informing us of any changes to information that they have provided. We cannot be held responsible for any errors unless the volunteer has informed us of such changes.

Data Security

Alzheimer Café UK is responsible for ensuring that any personal data held is kept securely. Personal information is not disclosed either orally or in writing or via Web pages or by any other means, accidentally or otherwise, to any unauthorised third party.

Personal information should be kept in a locked filing cabinet, drawer, or safe. If it is computerised, it should be coded, encrypted or password protected both on a local hard drive and on a network drive that is regularly backed up. If a copy is kept on removable storage media, that media must itself be kept in a locked filing cabinet, drawer, or safe.

Consent

The GDPR sets a high standard for consent and requires a positive opt-in. Alzheimer café UK will ask for separate consent for separate items and will not use vague or blanket requests for consent. As well as keeping evidence of any consent, the organisation will ensure that people can easily withdraw consent (and tell them how this can be done).

It should be noted, however, that consent is only one of the lawful bases on which data processing depends. In brief, the others include the following.

Contract: if processing someone's personal data is necessary to fulfil the organisation's contractual obligations to them.

Legal obligation: if processing personal data is necessary to comply with a common law or statutory obligation.

Vital interests: refers to processing personal data to protect someone's life.

Legitimate interests: applies when data is used in ways people would reasonably expect and which have a minimal privacy impact, or where there is a compelling justification for the processing.

Subject Access

Under the GDPR, an individual may request details of personal information which the organisation holds about him or her. The requested information will be provided within one month. If there is any reason for delay, that will be communicated within the four week time period. A request which is manifestly unfounded or excessive may be refused. The person concerned will then be informed of their right to contest this decision with the supervisory authority (the ICO).

If an individual believes that any information held on him or her is incorrect or incomplete, then they should contact the Data Controller as soon as possible. We will promptly correct any information found to be incorrect.

Dated: 24/5/2018