
Data Protection and Privacy Policy

Newcastle Community Centre

Approval date: 1/5/2019

Revision date: 1/5/2022
Revised 4/1/2023
Next revision date 1/1/2026

1.Responsibility for approval of policy	<i>Chairperson</i>
2.Responsibility for implementation	<i>Board</i>
3.Responsibility for ensuring review	<i>Chairperson</i>

Newcastle Community Centre Data Protection and Privacy Policy

1. Purpose

Newcastle Community Centre would never intentionally breach Data Protection and Privacy Policy. The purpose of this policy is to define Newcastle Community Centre's approach to managing personal data, outlining key principles and privacy rights for Data Subjects that must be followed to ensure that Newcastle Community Centre complies with Data Protection and Privacy legislation.

Newcastle Community Centre has no appetite to knowingly breach Data Protection and Privacy regulatory obligations; however it recognises that underlying Data Protection and Privacy risks can exist when holding and processing personal data. The minimum standards outlined in this policy aim to support Newcastle Community Centre in managing its Data Protection and Privacy Responsibilities. This Policy applies to all Newcastle Community Centre volunteers and agents that control, access and/or process personal data.

Policy Statement

Newcastle Community Centre is committed to ensuring the privacy rights of all Data Subjects (Volunteers, Community Centre users, and other individuals for whom Newcastle Community Centre holds personal information (e.g. Board members) are upheld at all times. This policy sets out the minimum standards for complying with Data Protection and Privacy legislation and for the safe and effective record keeping of personal data to:

- 1.1 Ensure that appropriate standards, procedures and controls are in place to mitigate risk and support compliance with Data Protection and Privacy legislation.
- 1.2 Protect the privacy of individuals' personal data (past, present and future) held by Newcastle Community Centre
- 1.3 Support compliance with Data Subject rights set out within Data Protection and Privacy legislation i.e. Data Subject Access Requests, Data Portability Requests etc.
- 1.4 Ensure that Newcastle Community Centre has appropriate mechanisms for detecting, investigating and for reporting suspected and actual personal data issues/events.

Newcastle Community Centre relies on legitimate interests in relation to processing personal information relating to Data Subjects (i.e. data is used in ways that Data Subjects would reasonably expect and that have a minimal privacy impact.).

Risks addressed by this policy.

Risks that Newcastle Community Centre is exposed to include, but are not limited to:

- 1.5 Processing personal data without having an appropriate legal basis or in a manner inconsistent for which it was first collected.
- 1.6 Maintaining excessive, inaccurate or out of date personal data or making unauthorised amendments to personal data.
- 1.7 Loss, theft and/or unauthorised disclosure of personal data, whether deliberate or accidental, making it available to unauthorised parties.
- 1.8 Breaching Data Protection & Privacy Legislation resulting in fines/sanctions or compensation for individuals (acting by themselves or through a representative)
- 1.9 Reputational damage and/or loss of Community Centre user and/or volunteer trust due to personal data breaches and non-compliance with Data Protection and Privacy legislation.
- 1.10 Failure to incorporate existing or emerging Data Protection and Privacy legislative requirements into Newcastle Community Centre services or processes.

Minimum Standards.

All volunteers of Newcastle Community Centre must adhere to the requirements set within Data Protection and Privacy/legislation, supporting Regulatory guidance and the minimum standards outlined in this policy when dealing with personal data. This Policy outlines the minimum standards of how to adhere to these rules and specific obligations.

- 1.11 Obtain and process personal data fairly, lawfully and in a transparent manner. There must be a lawful basis for collecting the data by identifying the grounds for processing including (1) Consent (2) Performance of a contract (3) Legal Obligation (4) Protecting the rights of the Data Subjects

Newcastle Community Centre Data Protection and Privacy Policy

- (5) Public Interest (6) Legitimate interests of the controller or a third party. Newcastle Community Centre will:
- 1.11.1 Ensure Data Subjects are made aware who is processing their personal data, the purpose and lawful basis for collecting and processing the data
 - 1.11.2 Ensure communication with Data Subjects is in clear and plain language
 - 1.11.3 Make Data Subjects aware of their rights in relation to their personal data and the safeguards in place to protect this information.
 - 1.11.4 Where consent has been identified as the reason for processing, Newcastle Community Centre will ensure that this is freely given, specific, informed and unambiguous and that such consent is appropriately recorded.
- 1.12 Personal data must be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- 1.13 Newcastle Community Centre will:
- 1.13.1 Ensure personal data is collected only for specified and legitimate purposes
 - 1.13.2 Only use the personal data for the specific purpose it was obtained.
 - 1.13.3 If for any reason Newcastle Community Centre wants to use personal data for any other reason, the Data Subject must be made aware and, where necessary, agree to same.
 - 1.13.4 Keep up to date written records of data processing activities.
 - 1.13.5 Not share Personal data or disclose to a third party (except where it relates to the purpose it was obtained)
- 1.14 Personal data must be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed. (Data Minimisation)
- 1.15 Personal Data must be accurate and up to date. Newcastle Community Centre will:
- 1.15.1 Review personal data held on a regular basis to make sure that it is accurate and up to date.
 - 1.15.2 Comply with requests from Data Subjects (e.g. in relation to having their data rectified, restricted or erased)
- 1.16 Personal Data must not be retained for longer than necessary for the specified purposes. Newcastle Community Centre will:
- 1.16.1 Ensure personal data is not retained for any longer than necessary to fulfil the purpose for which it was first obtained.
 - 1.16.2 Have defined procedures in place to manage the retention (including timelines), deletion or purging of personal data (see Appendices 2)
 - 1.16.3 Ensure that in the event of a systems failure, personal data is backed up and retrievable.
- 1.17 Personal data must be processed in a manner that ensures appropriate security of the personal data. Newcastle Community Centre will:
- 1.17.1 Have adequate controls in place to protect personal data during all stages of processing.
 - 1.17.2 Ensure and preserve the confidentiality, integrity and availability of personal data, including preventing unauthorised access to, or use of, personal data.
 - 1.17.3 Ensure access is only available to those who require it as part of their role.

Data Subjects Rights

Data Protection and Privacy legislation provides Data Subjects with a number of rights in relation to their personal data, these rights include (1) the right to be informed (2) the right of access (Data Subject Access Request) (3) the right to rectification (4) the right of erasure (5) the right to restrict processing (6) the right to data portability (7) the right to object to processing for certain purposes and (8) rights in relation to automated decision making and profiling. Newcastle Community Centre will:

- 1.18 Ensure Data Subjects rights are met with respect to each of their rights listed above.
- 1.19 Ensure Data Subjects Requests are properly authenticated and fulfilled within one calendar month.

Newcastle Community Centre Data Protection and Privacy Policy

Data Protection and Privacy Event Management Reporting.

Newcastle Community Centre reviews processes and procedures on a regular basis to ensure that processes are in place to detect, investigate and report instances of suspected and/or actual personal data events.

- 1.20 Where a Data Protection and Privacy event occurs, it is the responsibility of the volunteer or agent that discovers the event to notify the Chairperson of the event. The Chairperson will notify the Supervisory Authority without undue delay where a personal data event is likely to result in a risk to Data Subjects.

Contacting Customers for Direct Marketing.

Newcastle Community Centre does not in practice contact Data Subjects for the purpose of direct marketing. Should direct marketing occur, Newcastle Community Centre will:

- 1.21 Ensure individuals are only communicated with in line with their direct marketing preferences and comply with other relevant legislation for contacting customers e.g. E-Privacy Regulations.
- 1.22 Obtain consent to directly market to individuals, from the individual, prior to using their personal data and this consent must be kept up to date e.g. if an individual opts –out of direct marketing.

Awareness

Newcastle Community Centre ensures that all volunteers and agents are made aware of, and understand the importance of compliance with the Data Protection and Privacy Policy through the communication of this Policy.

Roles and Responsibilities.

All volunteers and agents of Newcastle Community Centre have a responsibility to ensure that any personal data to which they have access to in the course of their work is used in accordance with this Policy, ensuring it is protected from unauthorised access or disclosure and that any Data Protection and Privacy event or potential event in respect of personal data is reported immediately.

2. Review

This policy will be reviewed in three years or sooner if circumstances changed.

Signed:
Chairperson

Signed
Secretary

Date

Date

Signed version of policy kept in NCC Centre

Appendix 1 Key Definitions.

A **"Data Controller"** is a company (i.e. Newcastle Community Centre) /and individual or the legal person who determines the purpose and manner in which personal data is processed, is responsible for the use of personal data and having appropriate controls in place to comply with Data Protection Legislative requirements.

A **"Data Processor"** refers to a company, individual or the legal person who processes personal data on behalf of the Data Controller.

"Data Subject" is an individual who is the subject of personal data.

"Legitimate Interests" is one of the lawful bases for processing data as set out in Article 6 of the GDPR. It is defined as data processing that is necessary for legitimate interests of the Data Controller or the legitimate interest of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.

"Processing" means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not, by automated means, such as collection, recording, organisation structuring, storage, adaption of alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination , restriction erasure or destruction.

"Personal Data" means any information relating to an identified or identifiable natural person (Data Subject) an identifiable natural person is one who can be identified, directly or indirectly, by reference to an identifier which may include name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that individual.

"Consent" means any unambiguous, freely given, specific and informed indication of a person's agreement to allow their personal data be processed.

"Restriction of Processing" means the marking of stored personal data with the aim of limiting their processing in the future.

"Third party" means the organisation or party other than the Data Subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

"Data Protection and Privacy Event" means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

"Supervisory Authority" is the data protection supervisory authority in the Ireland.

"Data Minimisation" the minimum amount of personal data you need to fulfil a purpose.

Appendix 2. Documentation and Record Keeping (Volunteers and Community Centre users)

- Data Protection and Privacy legislation requires that personal information held by Newcastle Community Centre should be retained for no longer than is necessary for the purpose or purposes for which it was obtained.
- Personal data collected by Newcastle Community Centre in relation to Volunteers and Community Centre users is as follows;
 - Contact Name
 - Contact Phone Number
 - Contact Address
 - Contact email address (where provided)
 - Emergency Contact Name and Phone Number (where provided)
- The above personal data is used by Newcastle Community Centre in the following circumstances
 - To Contact Volunteers and Community Centre users in relation to Newcastle Community Centre activities.
 - To keep Volunteers and Community Centre users informed of social events and updates relating to Newcastle Community Centre and
 - For use in Newcastle Community Centre attendance records.
- Personal data relating to volunteers and Community Centre users is not shared with third parties and is restricted to the Data Subject and persons authorised within Newcastle Community Centre to process the data.