



Samatha Trust

Data Protection Policy

Last updated	8th May 2018
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Definitions

Charity	means The Samatha Trust, a registered charity No. 266367 (est. 1973).
GDPR	means the General Data Protection Regulation.
Responsible Person	means Robert Adkins - Samatha Trust's "Data Controller" for the Samatha Trust
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 Samatha Trust is committed to processing data in accordance with its responsibilities under the GDPR.

The Samatha Trust complies with Article 5 of the GDPR that requires personal data to 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 is 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;
- 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 and organisational measures."

2. General provisions

- a. This policy applies to all personal data processed by The Samatha Trust.
- b. The Responsible Person shall take responsibility for the Charity's ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.
- d. The Samatha Trust does not need to register with the Information Commissioners Office as an organisation that processes personal data because:
 - i. The Samatha Trust was established for not-for-profit making purposes and does not make a profit.
 - ii. The Samatha Trust only process information necessary to establish or maintain membership or support;
 - iii. The Samatha Trust only process information necessary to provide or administer activities for people who are members of the organisation or have regular contact with it;
 - iv. The Samatha Trust only shares the information with people within Samatha in ways necessary to carry out the organisation's activities.
 - v. The Samatha Trust does not share information with any individual or group outside Samatha at any time unless obliged to do so for safeguarding or legal reasons.
 - vi. The Samatha Trust only keep the information while the individual is a member or supporter or as long as necessary for member/supporter administration.

3. Lawful, fair and transparent processing

- a. To ensure its processing of data is lawful, fair and transparent, the Samatha Trust maintains a Register of Systems.
- b. The Register of Systems shall be reviewed at least annually.
- c. 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. Personal data processed by the charity is done on the following lawful basis:
 - i. LEGITIMATE INTERESTS - This legal basis was decided upon following consultation between the Responsible Person and representatives of the the Information Commissioners Office in April 2018. See the Samatha Trust Legitimate Interests Assessment (LIA) and the outcome available at https://samatha.org/data_protection

- ii. CONSENT -Personal data including financial and/or mental and/or physical health information is processed on the following lawful basis: consent.
- b. The Samatha Trust notes the appropriate lawful basies in the Register of Systems available at https://samatha.org/data_protection
- c. Consent, though not relied upon as a lawful basis for processing all personal data, will be sought as a matter of good practice for all personal information. Evidence of opt-in consent shall be kept with the personal data.
- d. Although communications are sent to individuals on the basis of legitimate interest, the option for the individual to revoke their consent will be clearly available and systems are 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.

6. Accuracy

- a. The Samatha Trust shall take reasonable steps to ensure personal data is accurate.
- b. Steps shall be put in place to ensure that personal data is kept up to date.

7. Security

- a. The Samatha Trust shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- b. The Samatha Trust shall ensure that personal data recorded in paper mediums is stored securely.
- c. The Samatha Trust never passes personal information on to third parties unless obliged to do so for safeguarding or legal reasons.
- d. Access to personal data is limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- e. When personal data is deleted this is done safely such that the data is irrecoverable.
- f. Appropriate back-up and disaster recovery solutions shall be in place.

8. 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](#)).

8. Contact

Any questions, concerns or comments about the Samatha Trust Data Protection Policy should be sent to:

admin@samatha.org

and headed "FAO The Samatha Data Controller".

END OF POLICY