

FRIENDS OF AMASANGO UK.....GDPR POLICY

- a) **Information we hold:**
We will ensure that all the information we hold will be kept securely in one Database and only used for our own mailing purposes of fund raising or information transfer to our existing and new supporters.
- b) **Accountability / Governance**
We will at all times ensure that our actions and policies adhere to these Policies with regard to Data Protection and that our DTO keeps an eye on such matters with regular, at least annually, reviews of procedures
- c) **Data Protection Officer**
We will appoint one of the Trustees to be our Data Protection Officer, such appointment to be reviewed annually and the DTO will have clear responsibility for ensuring this Policy is enacted and maintained.
- d) **Management Responsibility**
The DTO will have full management responsibility and authority to enact any enforcements/changes necessary to ensure this policy is maintained.
- e) **Information Risk**
The DTO will regularly review the risk of any data being mishandled/misused and will take action to ensure that no such situation will arise. Specifically, all the names/details/data on our database will be encrypted, supervised by the DTO, held securely with restricted access, and kept fully protected by proprietary virus protection software.
- f) **Data Protection by Design**
As per e) Above and the information will never be released to any other organisation to ensure there is no risk of external access.
- g) **Training and Awareness**
We will ensure that our DTO is a competent individual who understands the systems and controls involved in this policy and can enact them.
- h) **Control/Use of Sub processors**
We will not use any Sub processors and thus no controls will be necessary
- i) **Designated person/base**
Our DTO will be the designated Person with regard to this Policy with the current Chairman, Ian Irvin at the time of preparing this Policy, being ultimately responsible for ensuring the policy is enacted.
- j) **Breach Notification**
If any breaches of this policy occur, they are to be formally notified in writing/by email to the DTO, copied to the Chairman, who will immediately acknowledge receipt of the notification and enact an investigation to identify the factors relating to the alleged breach, producing a preliminary reply to the notifier within 7 days and a full report/conclusion within a month of notification.
- k) **Rights of Access**
Subject to no breach of the terms of this policy any person whose details are on the database will be entitled to request a summary of the information held on the database about them. A formal request to this end needs to be made to the DTO who should send the details, by post or email as requested, within 7 days of receiving the request.
- l) **Right of Rectification**
Should anyone discover that the details held on the database are inaccurate they can so notify the DTO who will, firstly check that the correction is right and legitimate and if it is arrange for the correction to be made within 7 days and confirm that the correction is made to the notifier.
- m) **Right to ensure retention/disposal**
Any person whose details are on the database has the right to ask for their details to be removed by the DTO, such action to be carried out with 7 days of notification. Unless so notified all details will remain on the database managed by the terms of this policy. All new additions to the database will be asked for authority for their details to be on the database for the purposes of a) above.
- n) **Right to restrict Processing**
Any person whose name is on the database can ask for their information use to be restricted to certain actions, i.e. just receiving Newsletters. However, if no such instructions are received information sent to them will be decided by the Trustees as appropriate but in accordance with and respect to a) above.
- o) **Right of Data Portability**
The data held on this database will only be used for AMASANGO purposes and not released to any Third Party and thus portability is not a factor for consideration
- p) **Security Policy**
The Trustees of Friends of Amasango UK will ensure that this Policy is maintained, enacted and reviewed as necessary

Signed

Name in BlockMARK NEWTON.....

Position.....Data Protection Officer.....

Date.....

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.....I.N.IRVIN.....

.....Chairman.....

.....9/5/18.....