



# DATA PROTECTION POLICY

## POLICY CONTROL

Version	Description	Date	Approval
2.0	Data Protection Policy	20 Feb 2021	
2.0	Approval	07 May 2021	Board
2.1	Full update	March 2024	
3.0	Board approval	11 June 2024	Board
3.1	Minor amendments changed logo and office address, added NFB certificate number, changed ref from EU legislation to UK legislation, added signature line.	18 February 2026	
<b>Next Review:</b>		June 2027	
<b>Data Protection Lead</b>		Nick Appleby (Trustee)	

**This policy has been approved for issue by the board of trustees**

**Signed:**

**Name:**

**Date:**

## LINKED POLICIES & DOCUMENTS

Privacy Policy

IT & Communications Policy

Confidentiality Agreement

Confidentiality Policy

## APPENDICES

A – Data Privacy Statement for Referral Agencies

B – Data Privacy Statement for Foodbank visitors/beneficiaries

C – Data Privacy Statement for Staff members

D – Data Privacy Statement for Supporters

E – Data Privacy Statement for Food donor groups

F – Data Privacy Statement for Funders

## DATA PROTECTION POLICY

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## 1. INTRODUCTION

Newquay Foodbank is registered with the Information Commissioner: Data Protection Registration Certificate ZA807023 and is governed by the Data Protection Act 2018, the UK General Data Protection Regulation (GDPR) and the Privacy and Electronic Communications Regulations 2003 (PECR).

Newquay Foodbank is also a data processor on behalf of the Trussell Trust – foodbank visitors' data is held on the Trussell Trust's DCS database. The Trussell Trust's controller reference is Z279027X.

The term "staff members" is used in Newquay Foodbank's policies to refer to any employees, volunteers, trustees or contractors that are 'working' for the Foodbank. "Foodbank visitors" is the term used to describe the beneficiaries of the Foodbank.

## 2. WHO THIS POLICY APPLIES TO

Newquay Foodbank staff members are required to adhere to this policy which is designed to protect the personal data of Newquay Foodbank data subjects - our supporters, volunteers, employees, trustees and beneficiaries.

## 3. KEY DEFINITIONS

Data protection law applies to how we process people's personal information. The key terms that we need to understand are:

- **Controller** – Newquay Foodbank is a controller as it collects and decides how personal information will be used.
- **Principles** – These are the rules that we must follow when processing personal information.
- **Processing** - This is what we do with personal information. It includes how we collect, record, store, share and use personal information.
- **Personal information** – This includes personal data and special category personal data.
- **Personal data** - This is information about people and held in computer systems, mobile devices including laptops, tablets, telephones, or in manual records such as paper files and notebooks. For example, name, address, date of birth, bank account details, interests. It also includes opinions about a person. For example, notes on how you think someone has behaved, performed or appears.
- **Special category personal data** – This is information about a person's health, religion, political opinion, trade union membership, race or ethnic origin, sexuality.
- **Data subject** - This is the person whose personal information is being processed. For example, a visitor, supporter, staff member.
- **Privacy policy** – This is how we inform people about how their personal information will be used. Newquay Foodbank's privacy policy is provided on our website.
- **Privacy notice** – this is a short notice when we collect personal information from people to inform them how their personal information will be used and to look at our privacy policy for more detail.

- **Data processor** – this is an organisation that we use to process personal information on behalf of the Trust. For example, a print and mailing house.
- **Information Commissioner’s Office (ICO)** - this is the government body responsible for enforcing data protection law in the UK.

#### **4. DATA PROTECTION PRINCIPLES**

All staff members are responsible for complying with the principles of data protection legislation which states that personal information must be:

- Collected and processed in a fair, lawful and transparent way.
- Used only for the reasons it was collected.
- Relevant and not excessive.
- Kept accurate and up to date and corrected or deleted if there are mistakes.
- Kept for no longer than it is needed.
- Kept safe to protect it from being lost, stolen or used inappropriately.
- Processed in accordance with people’s rights

In addition, the GDPR provides rules relating to the transfer of personal data to countries outside of the European Economic Area.

#### **5. DATA SUBJECTS**

Newquay Foodbank’s data subjects include supporters, Employees, Volunteers, Trustees and beneficiaries.

#### **6. DATA PROCESSING PURPOSES**

Newquay Foodbank needs to process personal information about our different data subjects to:

- Process donations and gift aid claims
- Process legacies and pledges
- Enable supporters to fundraise for us
- Enable supporters to participate in events
- Manage relationships with our supporters
- Provide supporters with information about us and the work that we do
- Manage marketing and communication preferences of our supporters
- Provide support to people who need to use the food bank
- Develop case studies and stories about our beneficiaries to promote and report on the work that we do
- Recruit and manage staff members
- Fulfil our legal and governance obligations as a registered charitable incorporated organisation

#### **7. LEGAL BASIS FOR PROCESSING PERSONAL INFORMATION**

Newquay Foodbank's legal basis for processing personal information is documented in our record of processing activity (ROPA) which is the 'Data Retention Schedule'. Personal information is processed with consent where appropriate, in order to meet our legal obligations as an employer, registered charity and company, and for our legitimate interests.

Newquay Foodbank may process some personal information based upon our legitimate interests. This is where the processing is required to fulfil our organisational objectives, is not to the detriment of our data subjects, and will not cause them damage or distress. We undertake legitimate interest assessments to balance the rights and interests of our data subjects with that of Newquay Foodbank in order to make a judgement as to whether the legitimate interest condition applies to our processing.

## **8. DATA PROTECTION LEADS RESPONSIBILITIES**

Newquay Foodbank's Data Protection Lead is required to:

- Provide compliance advice to staff members.
- Ensure that staff members receive appropriate data protection training and guidance at induction and on an ongoing 'refresher' basis
- Ensure that Newquay Foodbank's data protection policies and documents are appropriate and up to date.
- Be the focal point for the administration of any subject access requests.
- Deal with data subject rights in relation to erasure, objection, restriction and rectification that staff members feel unable to manage themselves.
- Log and assess all personal data breaches at Newquay Foodbank.
- Refer data breach assessments to the board of trustees for a final decision on whether they should be reported to the ICO.
- Renew and ensure that Newquay Foodbank's notification with the ICO is accurate.
- Keep a central register of all organisations that Newquay Foodbank shares personal information with.
- Advise staff members on the interpretation of this policy and guidelines and to monitor compliance with the policy

## **9. STAFF MEMBERS' RESPONSIBILITIES**

All staff members are responsible for:

- Working in compliance with the data protection principles as set out in this policy
- Ensuring that any personal information that they provide to Newquay Foodbank in connection with their employment, volunteering or other contraction agreement is accurate.
- Informing Newquay Foodbank of any changes to any personal information which they have provided, e.g. changes of address.
- Responding to requests to check the accuracy of the personal information held on them and processed by Newquay Foodbank.

## **10. DATA SUBJECT RIGHTS**

Newquay Foodbank respects the rights of its data subjects including the right to:

- To be informed – we do this by including appropriate privacy notice information when collecting personal information.
- Subject access - the right to view their personal information which we hold.
- Object and / or withdraw consent - where the processing of personal data could cause them significant damage or distress.

- Rectification - we must correct any inaccurate or incomplete personal information when asked.
- Erasure - deletion or the removal of their personal information where there is no compelling reason for its continued processing.

## **11. DATA SECURITY**

It is the responsibility of all staff members authorised to access personal data processed by Newquay Foodbank to ensure that data, whether held electronically or manually, is kept securely and not disclosed unlawfully, in accordance with this Policy. Unauthorised disclosure will usually be treated as a disciplinary matter and could be considered as constituting gross misconduct in some cases.

## **12. POLICY AWARENESS**

Data protection awareness will be included as part of induction. Changes to policy on data protection will be circulated to all staff members.

All staff members are expected to be familiar with and comply with the policy at all times.

## **13. REDRESS**

Anyone who considers that this policy has not been followed in respect of personal data about themselves should raise the matter with the Data Protection Lead.

## **14. STATUS OF THIS POLICY**

This policy does not form part of the formal contract of employment, but it is a condition of employment that staff members will abide by the rules and policies made by Newquay Foodbank from time to time.

Compliance is the responsibility of all staff members.

Any breach of this policy may lead to disciplinary action being taken, or even a criminal prosecution. Any questions or concerns about the interpretation or operation of this policy should be taken up with the Data Protection Lead.

## **15. REVIEW**

This policy and its implementation will be reviewed at least every three years, or where legislative or other change occurs.

## APPENDIX A TO THE DATA PROTECTION POLICY

### **Newquay Foodbank**

Unit 2, Darbari, Prow Park Newquay. TR7 2SX

Tel: Nick Appleby 07469 731426

[Dataprotection@newquayfoodbank.co.uk](mailto:Dataprotection@newquayfoodbank.co.uk)

<http://www.newquayfoodbank.co.uk>

ICO ref: ZA807023

## DATA PRIVACY STATEMENT FOR REFERRAL AGENCIES

### Personal data

When your organisation becomes a referral partner for Newquay Foodbank, the Foodbank will keep some data about you. This includes some “personal data” which relates to particular named people within the organisation i.e. contacts.

We also keep data about clients you refer to the Foodbank (known as beneficiaries). There is a separate Data Privacy Statement for Beneficiaries. Please ask if you would like to see a copy of that Data Privacy Statement.

### What personal data do we hold?

The Foodbank will keep data about Agencies in two ways:

1. **The Trussell Trust on-line data system** – This records the Agency name, Registered address, email, phone number, and name of principal contact for the organisation; It will also hold the name, job title and email address of any personnel authorised to make e-referrals to the Foodbank.
2. The **registration form** filled in by the Agency as part of their application to become a referral agency (where applicable). This form records the Agency name, Registered address, email, phone number, and name of principal contact for the organisation. It will also hold the name, signature and role of representative who initially applied and is authorised to issue Foodbank vouchers.

This and additional information which may be contained in emails between the Foodbank and your Agency is the only data the Foodbank will usually hold about the Agency. We do not obtain data in any other way.

### How is your personal data kept safe?

- The digital data is kept in a secure on-line folder on Newquay Foodbank’s SharePoint site
  - This can only be accessed with a login and password.
  - The data is held at a need-to-know level with access rights restricted as required.
  - We require all users of the system to sign a data protection statement that is included in the signed Confidentiality Agreement. This means they know that they must keep your data safe, and only use it for the right purposes.

- All our other staff members also have to sign a Confidentiality Agreement.
- We are as careful as possible to make sure no unauthorised person can log into the data system. For example, when a staff member leaves the Foodbank, we stop their access to the data system.

### **What is your data used for?**

Your data is only used to:

- Validate signatures on handwritten vouchers your organisation has issued.
- Contact you if there is an important query about a client you have referred to the Foodbank.
- Send you replacement vouchers.
- Keep in contact with you, for example to seek a meeting or invite your organisation to an event.

### **Does the Foodbank have a right to your data?**

Under Data Protection legislation, the Foodbank needs to have a “lawful basis” for keeping your data, and for using it. There are several types of “lawful basis” under which data can be held. We hold yours under “**Performance of a contract**”. When you become a referral agency Foodbank, we enter into a “contract” together. You undertake to send people in genuine crisis to the Foodbank with a completed voucher or Ereferral; we undertake to provide them with an emergency food parcel and contact you if there is a problem. To do this, we need to hold data about you.

That is why the lawful basis for holding your data is “performance of a contract”.

### **Who can see your data?**

On the on-line system, your data can only be seen by authorised people who have been given a login and password for the data system and are selected as needing to access this data.

We are as careful as possible to make sure no one else has access to your data.

### **How long will your data be kept?**

Your application form will be kept as long as you are a referral agency for the Foodbank.

If you stop being a referral agency, we will destroy your application form and any other signatories' forms held. We will also delete you from the online data system as an active referral agency.

The on-line data system also records data from all Foodbank vouchers. These will continue to show the name of the agency and the agency worker that issued a voucher, and their contact phone number, these details may also be recorded on the printed vouchers where issued. These are kept for six years in case we need to evidence proper use of public donations.

### **Who can you speak to if you have questions?**

If you have any questions about your data, and what we do with it, you should contact our Data Protection Lead and Trustee – Nick Appleby at 07469 731426 or [Dataprotection@newquayfoodbank.co.uk](mailto:Dataprotection@newquayfoodbank.co.uk)

### **What rights do you have?**

You have a number of rights under Data Protection legislation:

Right to know what data we hold

You have a right to know what personal data we hold about you.

This Data Privacy Statement describes the data that we will hold. But you can ask if we have any other data about you which is not covered by this Data Privacy Statement.

Right to have a copy of the data we hold

You can ask for a copy of the data we hold about you. This is called a “subject access request”.

If you make a “subject access request”, we will give you a copy of all the data we hold about you. We will do this within one month. If it helps, we will give you the data in a computer file.

Right to object

You can object if you think we are using your data in the wrong way.

You can also object if you think we don't have “lawful grounds” for using your data.

We will give you a statement explaining why we use your data and explaining the “lawful grounds”.

If you are still not happy, you can complain to the Information Commissioner's Office.

If we find we are using your data in the wrong way, we will stop immediately and stop it happening again.

Right to have your data corrected

If you think there is a mistake in your data, please inform us immediately. You have a right to have it corrected. We may need to check and confirm this data but will put right any mistakes as soon as possible.

Right to be forgotten

We promise to remove your data from our database within 24 hours of notification however as stated above the data may be retained on Beneficiary Vouchers for a maximum of six years. You have a right for this to happen, because we do not need to retain your data any longer than this six year period.

Finally, if anything happens to the data we hold about you, that could be a risk to you, we will do our best to both rectify the situation and inform you at the earliest opportunity.

## APPENDIX B TO THE DATA PROTECTION POLICY

### **Newquay Foodbank**

Unit 2, Darbari, Prow Park, Newquay. TR7 2SX

Tel: Nick Appleby 07469 731426

[Dataprotection@newquayfoodbank.co.uk](mailto:Dataprotection@newquayfoodbank.co.uk)

<http://www.newquayfoodbank.co.uk>

ICO ref: ZA807023

## DATA PRIVACY STATEMENT FOR FOODBANK VISITORS/BENEFICIARIES

### **Personal Information**

When you come to a Foodbank for help, the Foodbank will keep some information about you. This is “personal data”, because it is about you as an individual, and it can be linked to you. The Foodbank is responsible for looking after your personal information, known as the data controller, we’re registered with the Information Commissioners Office - registration A8753034.

If you have any questions about anything in this notice, you can contact the data protection lead on the phone and email details provided above.

### **What personal data do we hold?**

The Foodbank will keep the data that is on your foodbank voucher(s) including; your name, address, and year of birth; information about your household including the number of other adults and children living with you; the reason you were referred. We will also keep a record of who gave you the foodbank voucher, where you give permission any dietary requirements, and a phone number so we can contact you about the support we can offer.

The organisation that referred you may have also asked you about your ethnicity. We use this information to help us to better understand if we’re meeting the needs of different groups in our communities. This is sensitive personal information, and we need your permission to hold it. You can choose not to provide this information and it won’t affect the help you receive in any way. Once you collect your parcel this information is anonymised (so that it can’t be linked to you).

### **What is your data used for?**

We only ask for information about you that we need. The reasons we need your information include:

1. To provide you with the help and support you’ve requested.
2. To report on the reasons why people need our help, and the support we’ve provided.
3. If you’ve needed help from the Foodbank more than once, we use this information to understand if you need other help, such as help maximising your income. In this situation we may be able to offer support directly, or with your permission, refer you to another organisation who can help.

### **Does the Foodbank have a right to your data?**

Under UK Data Protection law, we need a “lawful basis” for using your personal information.

The Foodbank has a “legitimate interest” to use information you provide to offer you the help you’ve requested, and to evidence why people needed our help, and the support we’ve given.

In some situations we need your “consent” to use your information. For example, where you agree to providing a phone number so we can contact you about the support we’re providing or where you provide information about your ethnicity.

### **Who can see your data?**

Your personal information is only seen by people who need to do so for Foodbank reasons. It is not used for any other purpose. Your information is accessible to authorised people from Newquay Foodbank. If you go to a different Foodbank in the Trussell Trust Foodbank Network, then authorised people from both Foodbanks will be able to see your information – including your visits to the other Foodbank(s).

Agencies who refer you to a Foodbank using an on-line system called “e-referral” can see information about you and your visits to the Foodbank. If an agency with access to e-referral performs a successful search for someone with your name and postcode, they can see the date you last accessed help, but they can’t see any more detail, like your address or why you needed Foodbank help unless they refer you.

Your personal information is stored in a secure database run by the Trussell Trust, who are a separate data controller. The Trussell Trust is a data controller registered with the UK Information Commissioner’s Office registration number Z279027X. The Trussell Trust uses your information for statistical, research and monitoring purposes to campaign for a future where no one needs to use a Foodbank.

The Trussell Trust uses trusted suppliers to help run and manage the system. Where the Trussell Trust works with third parties, they have contracts or agreements in place to ensure your information is kept safe. For more information about how the Trussell Trust protected your information please visit <https://trusselltrust.org/privacy>

### **What rights do you have?**

Under UK Data Protection law you have several rights, including to:

- Ask us for a copy of your personal information. There are some exemptions, which mean you may not always receive all the information we process.
- Tell us to change or correct your personal information if it is incomplete or inaccurate.
- Ask us to restrict our processing of your personal data or to delete your personal data if there is no compelling reason for us to continue using or holding this information.
- Receive from us the personal information we hold about you which you have provided to us, in a reasonable format specified by you, so that you can send it to another organisation.
- Object, on grounds relating to your specific situation, to any of our processing activities where you feel this has a negative and disproportionate impact on you.

To exercise your rights please contact the Data Protection Lead and Trustee – Nick Appleby on 07469 731426 or [Dataprotection@newquayfoodbank.co.uk](mailto:Dataprotection@newquayfoodbank.co.uk)

Finally, if anything happens to the data we hold about you, that could be a risk to you, we will do our best to both rectify the situation and inform you at the earliest opportunity.

## APPENDIX C TO THE DATA PROTECTION POLICY

### **Newquay Foodbank**

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<http://www.newquayfoodbank.co.uk>

ICO ref: ZA807023

## DATA PRIVACY STATEMENT FOR FOODBANK STAFF MEMBERS

### Personal data

When you become a staff member at Newquay Foodbank, the Foodbank will keep some data about you. This is “personal data”, because it is about you as a particular person, and it can be linked to you.

### What personal data do we hold?

The Foodbank will keep personal data about you:

1. Your **initial contact information** which will record your name and contact details when you make contact with us about being a staff member.
2. The **application form** you filled in to request becoming a staff member records your name, address, contact details, next of kin, emergency contact, notes on health issues, availability, work experience or qualifications, if a DBS check was needed, and unspent criminal convictions.
4. A **staff record** if you are taken on. This holds your name, address, contact details, next of kin, emergency contact, notes on health issues, if a DBS check was needed, and a space for notes

In the event of a complaint, grievance, accusation or disciplinary matter, this will be recorded separately.

This is the only data the foodbank will usually hold about you. We do not get data about you in any other way.

### How is your personal data kept safe?

Any paper copies of data are kept in a secure, locked filing cabinet that is only accessed by the Foodbank Manager and Chair of Trustees. Online data is kept on SharePoint and the Assemble database. Access is controlled by individual log-in and password. Only the Foodbank Manager, Assistant Manager and Volunteer Coordinator have access to the staff records.

### What is your data used for?

Your data is only used for purposes directly relating to your volunteering or employment, particularly:

- To work out the best volunteer opportunities for you (if applicable)

- To contact you, if we need to
- To make sure you get the right medical care if you are taken ill when on Foodbank duties
- To contact the right person if you have an accident or are taken ill when on Foodbank duties
- To know that you have signed a Confidentiality Agreement, have been told about health and safety, and have/haven't given permission to be photographed

### **Does the foodbank have a right to your data?**

Under Data Protection legislation, the foodbank needs to have a "lawful basis" for keeping your data, and for using it. There are several types of "lawful basis". One of them is called "performance of a contract".

When you become a volunteer or employee, you enter into a "contract" (or agreement) with the foodbank. You undertake to play your part; we undertake to look after you, and other people, properly. To do this, we need to hold data about you. That is why the lawful basis for holding your data is "performance of a contract".

### **Who can see your data?**

The only people who have access to your data are the Foodbank Manager, Chair of Trustees, Assistant Manager and Volunteer Coordinator (where applicable). Under certain circumstances your immediate line manager (eg Lead) may be given access to specific data as needed. We are as careful as possible to make sure no one else has access to your data.

### **How long will your data be kept?**

If we are unable to find a position for you, your application form will be kept for one year, unless you ask us to delete it sooner, so that we can get in touch in case a position becomes available.

If you become a staff member, then your data is kept for as long as you are working at the Foodbank. Once you stop being a staff member, we will keep your data for a further year. This is so that we can contact you if we need to ask you any questions about your time working at the Foodbank. It also helps us if you ask us for a reference, because you are applying for a job or another volunteer position.

After a year your records will be destroyed, unless there is a reason why we still need to be in touch with you about your time as a staff member. We may keep records of any grievance, dispute or accusation for up to six years.

### **Who can you speak to if you have questions?**

If you have questions about your data, and what we do with it, you should contact the Data Protection Lead and Trustee – Nick Appleby on 07469 731426 or [Dataprotection@newquayfoodbank.co.uk](mailto:Dataprotection@newquayfoodbank.co.uk)

## **What rights do you have?**

You have a number of rights under Data Protection legislation:

### 1. Right to know what data we hold:

You have a right to know what personal data we hold about you. This Data Privacy Statement describes the data that we will hold. But you can ask if we have any other data about you which is not covered by this Data Privacy Statement.

### 2. Right to have a copy of the data we hold:

You can ask for a copy of the data we hold about you. This is called a “subject access request”. If you make a “subject access request”, we will give you a copy of all the data we hold about you. We will do this within one month. If it helps, we will give you the data in a computer file.

### 3. Right to object:

You can object if you think we are using your data in the wrong way. You can also object if you think we don't have “lawful grounds” for using your data. We will give you a statement explaining why we use your data and explaining the “lawful grounds”. If you are still not happy, you can complain to the Information Commissioner's Office. If we find we are using your data in the wrong way, we will stop immediately and stop it happening again.

### 4. Right to have your data corrected:

If you think there is a mistake in your data, please tell us. You have a right to have it corrected. We may need to check what is the correct data, but will put right any mistakes as soon as possible.

### 5. Right to be forgotten:

We promise to remove your data after six years. You have a right for this to happen, because we don't need to keep your data any longer than six years.

Finally, if anything happens to the data we hold about you, that could be a risk to you, we will do our best to both rectify the situation and inform you at the earliest opportunity.

## APPENDIX D TO THE DATA PROTECTION POLICY

### **Newquay Foodbank**

Unit 2, Darbari, Prow Park, Newquay. TR7 2SX

Tel: Nick Appleby 07469 731426

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<http://www.newquayfoodbank.co.uk>

ICO ref: ZA807023

## DATA PRIVACY STATEMENT FOR FOODBANK SUPPORTERS

### **Personal data**

There are many ways in which you can be a supporter of the foodbank. Some supporters receive newsletters or similar updates about the work of the foodbank. This Data Privacy Statement is for this group. In this Data Privacy Statement, the word “supporter” means someone who receives newsletters or similar updates.

There are separate Data Privacy Statements for staff members, food donor groups, beneficiaries and referral agencies. If you are in one of these groups, please also ask for its Data Privacy Statement, if you would like to see it.

### **What personal data do we hold?**

As a supporter, we may hold your name and postal address, email address and/or social media identity.

### **How is your personal data kept safe?**

Your details are held in a spreadsheet which is held on Newquay Foodbank’s SharePoint site. Access is controlled by individual log-in and password and only staff members with relevant roles will have access to this area of SharePoint.

You might have made contact with us through our website, using the “Join our mailing list” facility, or other “contact us” pages. If you have done this, your name and email address will also be stored on our website.

### **What is your data used for?**

Your data is only used to send you newsletters, social media posts or other communication about the work of the foodbank. This may include requests for help with food donations, financial donations or volunteering.

### **Does the foodbank have a right to your data?**

Under Data Protection legislation, the foodbank needs to have a “lawful basis” for keeping your data, and for using it. There are several types of “lawful basis”. One of them is called “legitimate interest”. If you are a staff member or a member of a regular food donor group, or a referral agency, then it is reasonable (“legitimate”) for us to keep you informed about the work of the foodbank.

If you are not in one of those groups, we will not send you newsletters or other information unless you have agreed to be added to a mailing list. We will ask you clearly if you are happy to be added to a mailing list. You can say yes or no, or not reply. If you say yes, you will have given “consent” and we will record your

details on the mailing list. The lawful basis for us to hold your data is then called “consent”. We will not record your details on the mailing list unless you give consent.

### **Who can see your data?**

The only people who have access to your data are the Social Media volunteer and the Foodbank Management team. We are as careful as possible to make sure no one else has access to your data.

### **How long will your data be kept?**

Your details will be kept as long as you are happy to receive newsletters or information. At any time you can tell us that you are withdrawing consent. If you do that, we will take your details off the mailing list. We may keep enough of your details to make sure we don't send you any information by mistake.

### **Who can you speak to if you have questions?**

If you have questions about your data, and what we do with it, you should contact the Data Protection Lead and Trustee – Nick Appleby on 07469 731426 or [Dataprotection@newquayfoodbank.co.uk](mailto:Dataprotection@newquayfoodbank.co.uk)

### **What rights do you have?**

You have a number of rights under Data Protection legislation:

#### **Right to know what data we hold**

You have a right to know what personal data we hold about you.

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#### **Right to have a copy of the data we hold**

You can ask for a copy of the data we hold about you. This is called a “subject access request”.

If you make a “subject access request”, we will give you a copy of all the data we hold about you.

We will do this within one month. If it helps, we will give you the data in a computer file.

#### **Right to object**

You can object if you think we are using your data in the wrong way.

You can also object if you think we don't have “lawful grounds” for using your data.

We will give you a statement explaining why we use your data and explaining the “lawful grounds”.

If you are still not happy, you can complain to the Information Commissioner's Office.

If we find we are using your data in the wrong way, we will stop immediately and stop it happening again.

#### **Right to have your data corrected**

If you think there is a mistake in your data, please tell us. You have a right to have it corrected.

We may need to check what is the correct data but will put right any mistakes as soon as possible.

#### **Right to be forgotten**

We promise to remove your data after six years. You have a right for this to happen, because we don't need to keep your data any longer than six years.

Finally, if anything happens to the data we hold about you, that could be a risk to you, we will do our best to both rectify the situation and inform you at the earliest opportunity.

## APPENDIX E TO THE DATA PROTECTION POLICY

### **Newquay Foodbank**

Unit 2, Darbari, Prow Park, Newquay. TR7 2SX

Tel: Nick Appleby 07469 731426

[Dataprotection@newquayfoodbank.co.uk](mailto:Dataprotection@newquayfoodbank.co.uk)

<http://www.newquayfoodbank.co.uk>

ICO ref: ZA807023

## DATA PRIVACY STATEMENT FOR FOOD DONOR GROUPS

### **Personal data**

When your organisation becomes a regular food donor for the foodbank, the foodbank will keep some data about you. This includes some “personal data”, which relates to particular named people.

### **What personal data do we hold?**

The foodbank will keep data about you on an on-line spreadsheet. This will record the name of your group, and your main contact’s name, phone numbers, email address and postal address. Specific staff members may hold your data as Contacts in their mobile phones ie the people you are in regular contact with.

This is the only data the foodbank will usually hold about you. We do not get data about you in any other way. There may also be information about you in emails.

### **How is your personal data kept safe?**

The spreadsheet will be held in a secure area on Newquay Foodbank’s SharePoint site which can only be accessed with a login and password, and access is limited to log ins that may require this data. We require all staff members to sign a Confidentiality Agreement that includes a “data protection statement”. This means they know they must keep your data safe, and only use it for the right purposes.

We are as careful as possible to make sure no unauthorised person can log into the data system. For example, when a staff member leaves the foodbank, we remove their access.

### **What is your data used for?**

Your data will only be used to contact you about food donations. For example, this could be to advise you of shortage items, to thank you for donations, or to discuss delivery or collection arrangements for donations.

We may also use your data to send you newsletters or information about the work of the Foodbank. There is a separate Data Privacy Statement for “Supporters”. Please ask if you would like to see a copy of that Data Privacy Statement.

### **Does the foodbank have a right to your data?**

Under Data Protection legislation, the Foodbank needs to have a “lawful basis” for keeping your data, and for using it. There are several types of “lawful basis”. One of them is called “performance of a contract”. When you become a food donor group, we enter into a “contract” or relationship together. You undertake to make food donations to the Foodbank; we undertake to give you information that will help you. To do this,

we need to hold data about you. That is why the lawful basis for holding your data is “performance of a contract”.

If we send you newsletters or information about the work of the Foodbank, the lawful basis for this is “legitimate interest”. As a supporter group, we believe that it is reasonable (“legitimate”) for us to keep you informed. Newsletters or similar communications will always have an opt-out or “unsubscribe” option.

### **Who can see your data?**

Your data on the spreadsheet can only be seen by authorised people who have been given a login and password that has access to the relevant secure area of SharePoint.

We are as careful as possible to make sure no one else has access to your data.

### **How long will your data be kept?**

Your data will be kept while you are a donor group.

If you tell us you have stopped being a donor group, we will delete your organisation’s data from the on-line system’s record of active donor groups.

The data system will still record donation amounts and dates, but your contact details will not be kept.

### **Who can you speak to if you have questions?**

If you have questions about your data, and what we do with it, you should contact the Data Protection Lead and Trustee – Nick Appleby on 07469 731426 or [Dataprotection@newquayfoodbank.co.uk](mailto:Dataprotection@newquayfoodbank.co.uk)

### **What rights do you have?**

You have a number of rights under Data Protection legislation:

#### **Right to know what data we hold**

You have a right to know what personal data we hold about you.

This Data Privacy Statement describes the data that we will hold. But you can ask if we have any other data about you which is not covered by this Data Privacy Statement.

#### **Right to have a copy of the data we hold**

You can ask for a copy of the data we hold about you. This is called a “subject access request”.

If you make a “subject access request”, we will give you a copy of all the data we hold about you.

We will do this within one month. If it helps, we will give you the data in a computer file.

#### **Right to object**

You can object if you think we are using your data in the wrong way.

You can also object if you think we don’t have “lawful grounds” for using your data.

We will give you a statement explaining why we use your data and explaining the “lawful grounds”.

If you are still not happy, you can complain to the Information Commissioner’s Office.

If we find we are using your data in the wrong way, we will stop immediately and stop it happening again.

#### **Right to have your data corrected**

If you think there is a mistake in your data, please tell us. You have a right to have it corrected.

We may need to check what is the correct data but will put right any mistakes as soon as possible.

### Right to be forgotten

We promise to remove your data after six years. You have a right for this to happen, because we don't need to keep your data any longer than six years.

Finally, if anything happens to the data we hold about you, that could be a risk to you, we will do our best to both rectify the situation and inform you at the earliest opportunity.

## **APPENDIX F TO THE DATA PROTECTION POLICY**

### **Newquay Foodbank**

Unit 2, Darbari, Prow Park, Newquay. TR7 2SX

Tel: Nick Appleby 07469 731426

[Dataprotection@newquayfoodbank.co.uk](mailto:Dataprotection@newquayfoodbank.co.uk)

<http://www.newquayfoodbank.co.uk>

ICO ref: ZA807023

## **DATA PRIVACY STATEMENT FOR FUNDERS**

### **Personal data**

When your organisation becomes a funder of the foodbank, the foodbank will keep some data about you. This includes some "personal data", which relates to particular named people.

### **What personal data do we hold?**

The foodbank will keep data about you on an on-line spreadsheet. This will record the name of your group, and your main contact's name, phone numbers, email address and postal address (where appropriate). We will also hold details of the funding provided and any criteria specifications. Some staff members may hold your data as Contacts in their mobile phones ie the people you are in regular contact with.

This is the only data the foodbank will usually hold about you. We do not get data about you in any other way. There may also be information about you in emails.

### **How is your personal data kept safe?**

The spreadsheet will be held in a secure area on Newquay Foodbank's SharePoint site which can only be accessed with a login and password, and access is limited to log ins that may require this data. We require all staff members to sign a Confidentiality Agreement that includes a "data protection statement". This means they know they must keep your data safe, and only use it for the right purposes.

We are as careful as possible to make sure no unauthorised person can log into the data system. For example, when a staff member leaves the foodbank, we remove their access.

### **What is your data used for?**

Your data will only be used to contact you about the funding you have provided. For example, this could be to thank you for the funding, or to provide funding updates.

We may also use your data to send you newsletters or information about the work of the Foodbank. There is a separate Data Privacy Statement for “Supporters”. Please ask if you would like to see a copy of that Data Privacy Statement.

### **Does the foodbank have a right to your data?**

Under Data Protection legislation, the Foodbank needs to have a “lawful basis” for keeping your data, and for using it. There are several types of “lawful basis”. One of them is called “performance of a contract”. When you become a Foodbank funder, we enter into a “contract” or relationship together. You undertake to provide funding to the Foodbank and we undertake to give you information that relates to that funding. To do this, we need to hold data about you. That is why the lawful basis for holding your data is “performance of a contract”.

If we send you newsletters or information about the work of the Foodbank, the lawful basis for this is “legitimate interest”. As a funding supporter group, we believe that it is reasonable (“legitimate”) for us to keep you informed. Newsletters or similar communications will always have an opt-out or “unsubscribe” option.

### **Who can see your data?**

Your data on the spreadsheet can only be seen by authorised people who have been given a login and password that has access to the relevant secure area of SharePoint.

We are as careful as possible to make sure no one else has access to your data.

### **How long will your data be kept?**

Your data will be kept while you are a funder of the Foodbank.

Once you stop being a funder, we will delete your organisation’s data from the on-line system’s record of active funder groups.

The data system will still record funding amounts and some details, but your contact details will not be kept.

### **Who can you speak to if you have questions?**

If you have questions about your data, and what we do with it, you should contact the Data Protection Lead and Trustee – Nick Appleby on 07469 731426 or [Dataprotection@newquayfoodbank.co.uk](mailto:Dataprotection@newquayfoodbank.co.uk)

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