



Tees Heritage Trust Ltd

Registered Office: 17 Falcon Court, Preston Farm Industrial Estate, Stockton on Tees TS18 3TU
Company Registration No.1618592 (inc. England). Charity Registration No.512497

General Data Protection Regulation (GDPR) Policy.

Data protection rules changed on 25th May 2018 with the implementation of the General Data Protection Regulation (GDPR). This gives people more control over how their personal information is used and makes it quicker and easier for them to check and update the information that is held about them.

Tees Heritage Trust Ltd (the Trust) needs to keep certain information on its members, and trustees to carry out its day to day operations, to meet its objectives and to comply with legal obligations.

The Trust is committed to ensuring any personal data will be dealt with in line with the General Data Protection Regulations (2018). To comply with the law, personal information will be collected and used fairly, stored safely and not disclosed to any other person unlawfully. The aim of this policy is to ensure that everyone handling personal data is fully aware of the requirements and acts in accordance with data protection procedures. This document also outlines key data protection procedures.

This policy covers trustees, members and contractors.

In line with the GDPR 2018 principles, the Trust will ensure that personal data will:

- Be obtained fairly, lawfully and transparently and shall not be processed unless certain conditions are met;*
- Be obtained for a specific and lawful purpose;
- Be adequate, relevant but not excessive;
- Be accurate and kept up to date;
- Not be held longer than necessary;
- Be processed in accordance with the rights of data subjects;
- Be subject to appropriate security measures;

**The definition of 'Processing' is obtaining, using, holding, amending, disclosing, destroying and deleting personal data. This includes some paper based personal data as well as that kept electronically.*

The Trust does not have a subscribing membership like local history societies or friends groups. The membership of the Trust is limited to ordinary members (limited to 50 by the Memorandum & Articles of Association) who have been invited or nominated by local authorities and those members who have been elected to the Council of Management and who are therefore directors and trustees of Tees Heritage Trust Ltd.

Personal data

Personal data collected by the Trust is limited to that which is necessary to carry out its business.

The names, addresses (home and/or business) and occupations of all members (past and present) are kept electronically in the Register of Directors and Members. The register also includes the dates-of-birth of all directors. This record is required by Company Law and the

contents are entered at Companies House and the Charity Commission. Directors names can be viewed on the websites of Companies House and the Charity Commission, but most members have opted to use as their address the business address of the Trust at Falcon Court so that their personal address is blocked from view.

An electronic 'short-list' of current members and directors is also maintained. This contains names, addresses (home and/or business), telephone numbers and email addresses and is used as a means of communicating members to provide agendas, minutes and other information relevant to the work of the Trust.

All members' and directors' email and contact information is updated annually and is stored securely according to data protection legislation of the United Kingdom and European Union and will not be sent to third parties without your permission. All email communications with more than one Trust member is undertaken using the blind or 'Bcc' box to ensure privacy.

Photographs

Occasionally photographs including images of members may be taken at Trust events and sites and these may be used in the promotion of the Trust via its website and Facebook page. The Information Commission Office has advised that it is reasonable just to mention that photographs are being taken at any event and, if individuals don't want to be included, to let the photographer know and to stand out of the picture area.

Policy

The Trust processes the following types of personal information (additional information may be collected and processed when necessary):

- contact details (email, address and phone numbers) for Trustees, members and contractors;
- details of the projects being undertaken by FBPT;
- references from other heritage organisations;
- photographs;
- project details of contractors;
- bank account numbers where appropriate.

Personal information is kept in the following forms:

- held electronically on a computer and backup drive;
- held on backup drives by directors, members and contractors;
- held on paper files which are within locked premises.

Groups of people within the organisation who will process personal information are directors, members and contractors.

Overall responsibility for personal data in a not-for profit organisation rests with the governing body. In the case of Tees Heritage Trust, this is the Council of Management. The Council is responsible for:

- understanding and communicating obligations under the GDPR;
- identifying potential problem areas or risks;
- annually renewing latest guidance about data protection.

The Council of Management will ensure that:

- Anyone wanting to make enquiries about handling personal information knows what to do;
- Queries about handling personal information will be dealt with swiftly and politely.
- Any disclosure of personal data will be in line with procedures.

Before personal information is collected, Council of Management will consider:

- what the minimum amount of data that is needed to provide our services to an individual;
- how long we need the data for;
- security for that information and who has access to it;
- how the data will be processed

Council of Management will inform people whose information is gathered about the following:

- that Tees Heritage Trust Ltd has a Privacy policy;
- to whom any enquiries or comments about personal data should be addressed;

The Council of Management will keep regular contact with Trustees, members and contractors to ensure information is kept accurate and up to date.

The Council of Management takes steps to ensure that personal data is kept secure at all times against unauthorised or unlawful loss or disclosure. Any unauthorised disclosure of personal data to a third party by a Trustee or member may result in possible penalties for a Trustee, including removal from the Council of Management.

Anyone whose personal information is processed by the Trust has the right:

1. To be informed.
2. Of access
3. Of rectification
4. Of erasure / the right to be forgotten
5. To restrict processing
6. To object

Individuals have a right under the GDPR to access personal data being kept about them by the Trust. Any person wishing to exercise this right should apply in writing to the Trust at Tees Heritage Trust Ltd, c/o Jacksons Law, 17 Falcon Court, Preston Farm Industrial Estate, Stockton on Tees TS18 3TU. The Trust then has one calendar month to respond unless the request is considered to be particularly onerous. In those circumstances, the data subject will be informed that an extension has been added to the time allowed to fulfil the request. The following information will be required before access is granted:

- Full name and contact details of the person making the request;
- Their relationship with the organisation;
- Any other relevant information;

The Trust may also require proof of identity before access is granted.

This policy will be reviewed at intervals of every 2 years to ensure it remains up to date and compliant with the law.

This Policy was approved by the Trust's Council of Management at its meeting held on 14th November 2018.