

Ethiopian Heritage Trust (UK)

Data Protection Manual

VERSION CONTROL

Date	Version	Author	Description of change
January 2019	V1.0	Christopher Sargent	Initial Document
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1 INTRODUCTION

This Data Protection Manual embodies the instructions of the Management of the Ethiopian Heritage Trust (UK) (the “Trust”) and should be followed at all times unless instructed otherwise.

The manual seeks to reflect applicable UK legislation.

The Data Protection Officer (currently Christopher Sargent) reports to the Trustees.

The General Data Protection Regulation 2016

The UK Data Protection Act came into force on 25 May 2018. This Act updates data protection laws in the UK, supplements the General Data Protection Regulation (EU) 2016/679 (GDPR), and implements the EU Law Enforcement Directive (LED). It also extends data protection laws to areas not covered by the GDPR or the LED. The primary purpose of the UK Data Protection Act is to safeguard the 'rights and freedoms' of natural persons, specifically living individuals. The Act aims to ensure that personal data is processed in a manner that is consistent with individuals' knowledge and, where feasible, only with their explicit consent

Territorial Scope - The UK Data Protection Act 2018 operates in alignment with the UK GDPR to regulate data controllers within the United Kingdom, regardless of where their data processing activities occur. The Act and UK GDPR jointly cover the processing of personal data in the context of an establishment within the UK. Furthermore, this legal framework also extends to controllers outside the United Kingdom if they process personal data to offer goods and services to, or monitor the behavior of, individuals residing in the UK.

2 DATA PROTECTION POLICY

The Data Protection Policy of the Ethiopian Heritage Trust (UK) is as follows:

- 1 Personal data is collected and held by the Trust solely for the legitimate business purposes of the Trust.
- 2 This personal data is limited to:
 - Individuals' names (full names in the case of UK tax payers). These individuals are members, past members and donors.
 - Postal addresses, telephone numbers, email addresses and membership and donor payment records (i.e. membership fees and separate donor payments), and UK tax paying status.
- 3 Postal addresses, telephone numbers and email addresses are held to enable contact to be made in the normal course of Trust operations, e.g. distribution of Newsletters, advice of upcoming meetings or other events, reminders of fees due, etc. UK tax paying status is needed to advise to the Inland Revenue when the Trust applies for Gift Aid refunds.
- 4 All the above information is normally provided by the new or existing member or donor, by email or in writing.
- 5 Data is retained while members / donors maintain their membership of the Trust.
- 6 If a member / donor resigns their membership, their personal data is retained for a further period of two years (to allow contact to be made to ask if they wish to re-join the Trust). Thereafter the personal data is deleted (electronic records) or shredded (paper records).
- 7 Access to personal data within the Trust is restricted to the Trustees and to two Trust volunteers. These latter two are involved on a voluntary basis in the administration of the Trust.
- 8 Copies of this Policy and any significant updates and amendments are circulated to all members / donors and to new members / donors.
- 9 Data Subject Consent

This is defined as 'any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data'.

And see Point 8 above. New members are advised very clearly on joining that by joining they are giving their consent to the retention of personal data as set out in this manual.

2 DATA PROTECTION POLICY

10 Disclosure of the Data

There will be no disclosure of data without the permission of the person concerned.

There will be no transfer of data to any non-EEA country.

11 Security of the Data

The data is retained in electronic form in Excel or Access files on the PC at the home of the Treasurer. This PC is password protected and the PC is switched off when left unattended.

It is under consideration whether to additional encrypt the relevant files.

11 Use of the Data

The data is used for contact information for getting in touch with members / donors, as a reminder of memberships due, preparation of accounts and completion of claim forms for Gift Aid to be submitted to the UK Inland Revenue.

12 Data Subjects

Clearly identified individuals (see elsewhere in this manual) including Trustees, members / donors and third parties, e.g. auditors, who are assisting the Trust.

13 Data Controller and Data Processor

These are within the Trust.

3 RETENTION POLICY

- 1 Data is retained while members / donors maintain their membership of the Trust.
- 2 If a member / donor resigns their membership, their personal data is retained for a further period of two years (to allow contact to be made to ask if they wish to re-join the Trust). Thereafter the personal data is deleted (electronic records) or shredded (paper records).

4 TRUST PROCEDURES

These are:

Trustees

- 1 Read this manual and provide written confirmation to the Data Protection Officer that you have done so.
- 2 Abide by the manual's instructions in all respects.

Data Protection Officer

In general the DPO is responsible for reviewing the register of processing annually in the light of any changes to the Trust's activities (as determined by changes to the data inventory register and the management review) and to any additional requirements identified by means of data impact assessments. This register needs to be available on the supervisory authority's request.

- 1 Update and amend this manual as necessary and re-circulate revised copies to all members / donors.
- 2 Provide a current copy for all new members / donors.
- 3 Seek to keep up to date with current legislation.
- 4 Obtain written confirmation from all Trustees that they have read this manual and undertake to abide by its instructions.

5 PEOPLE'S RIGHTS REGARDING THEIR PERSONAL DATA

In summary, under the law people's rights are:

- 1 The right to be informed – being able to be told what data is being held about them and to what use it is being put.
- 2 The right of access – being able to request a copy of their data being held.
- 3 The right of rectification – being able to have incorrect data corrected.
- 4 The right of erasure – being able to ask that their data be deleted / destroyed.
- 5 The right to restrict processing – being able to limit the amount or type of data being used.
- 6 The right to data portability – requesting to move their data electronically to another business.
- 7 The right to object – being able to request that a stop be put to using their data.

6 HOW TO REQUEST ACCESS TO, OR CORRECTION OF, PERSONAL DATA

You may make contact with the Trust in person, by phone, by post or by email.

Post: Data Protection Officer
European Heritage Trust (UK)
12, The Glebe
Blackheath
London SE3 9TG

Phone: 0300 365 1417

Email: info@ethiopianheritagetrustuk.org

7 HOW TO COMPLAIN TO THE INFORMATION COMMISSIONER'S OFFICE (ICO)

Contact the ICO office by phone (0303 123 1113) or as directed by their website.