Registered Charity No 1141084 - Company No 07454427

#### DATA PROTECTION POLICY

### 1. Introduction

At the Scalabrini Fathers Company, we are committed to protecting and respecting your privacy. This Data Protection Policy outlines how we collect, use, and protect personal data in compliance with the General Data Protection Regulation (GDPR) and relevant national data protection laws. It applies to all personal data processed by the Company, including that of donors, beneficiaries, volunteers, staff, and other stakeholders.

# 2. Purpose of the Policy

The purpose of this policy is to ensure that the Scalabrini Fathers Company follows best practices in data protection, maintains the highest standards of security, and complies with applicable laws. The charity will collect, store, and manage personal data responsibly and transparently, ensuring confidentiality and integrity.

### 3. Key Definitions

- **Personal Data:** Information relating to an identifiable individual (name, address, phone number, etc.).
- **Processing:** Any operation performed on personal data, such as collection, storage, or deletion.
- **Data Subject:** The individual whose personal data is being processed.
- **Data Controller:** The organization responsible for deciding how and why personal data is processed.
- **Data Processor:** A third party that processes personal data on behalf of the data controller.

#### 4. Data Protection Principles

We adhere to the following principles when processing personal data:

- **Lawfulness, Fairness, and Transparency:** Personal data must be processed lawfully, fairly, and transparently.
- **Purpose Limitation:** Data will be collected for specified, explicit, and legitimate purposes and not processed for any further incompatible purposes.
- **Data Minimization:** Personal data collected will be adequate, relevant, and limited to what is necessary for the intended purposes.
- Accuracy: Personal data will be accurate and kept up to date.
- **Storage Limitation:** Data will not be kept for longer than necessary.
- Integrity and Confidentiality: Data will be processed in a manner that ensures
  appropriate security, including protection against unauthorized or unlawful
  processing, accidental loss, destruction, or damage.

### 5. Legal Bases for Processing Data

The Scalabrini Fathers Company will only process personal data when there is a lawful basis for doing so. These include:

- **Consent:** The individual has given clear consent for processing.
- Contractual Obligations: Processing is necessary for a contract with the individual.
- **Legal Obligation:** Processing is necessary to comply with the law.
- **Legitimate Interests:** Processing is necessary for the legitimate interests of the charity, provided those interests do not override the rights and freedoms of the data subject.

#### 6. How We Collect Data

Personal data may be collected through various means, including:

- Online forms (e.g., donation forms, subscription to newsletters).
- Volunteer registration forms.
- Direct communications (phone, email, mail).
- Event registrations and participation.
- Any other methods through which individuals provide their information.

### 7. How We Use Personal Data

We may use personal data for the following purposes:

- Managing donations and financial contributions.
- Communicating with donors, beneficiaries, and volunteers.
- Coordinating volunteer activities and programs.
- Providing support to beneficiaries.
- Complying with legal obligations.
- Sending newsletters, updates, and information about the charity's activities and events (with consent).

# 8. Data Sharing and Disclosure

The Scalabrini Fathers Company will not share personal data with third parties unless:

- The data subject has provided explicit consent.
- It is necessary to fulfil contractual obligations.
- There is a legal requirement to share the data.
- It is necessary to protect the vital interests of the data subject or another person.
- The data is shared with trusted service providers who are contractually bound to comply with data protection laws.

# 9. Data Security

We are committed to ensuring that personal data is secure. We take appropriate technical and organizational measures to prevent unauthorized access, loss, or damage to personal data. These measures include:

- Secure storage systems.
- Encryption of sensitive data.
- Restricted access to personal data based on job role.
- Regular review of security practices.

#### 10. Data Retention

We will retain personal data for as long as necessary to fulfil the purposes for which it was collected. Once the data is no longer required, it will be securely deleted or anonymized.

# 11. Data Subject Rights

Individuals have the following rights regarding their personal data:

- **Right to Access:** Request access to their personal data and information about how it is processed.
- Right to Rectification: Request that incorrect or incomplete data be corrected.
- **Right to Erasure ("Right to be Forgotten"):** Request the deletion of their data when it is no longer necessary.
- **Right to Restriction of Processing:** Request a restriction on the processing of their data in certain circumstances.
- **Right to Data Portability:** Request to receive their data in a structured, commonly used, and machine-readable format.
- **Right to Object:** Object to the processing of their data based on legitimate interests or for direct marketing purposes.
- **Right to Withdraw Consent:** Withdraw consent at any time if data is being processed based on consent.

#### 12. Breach Notification

In the event of a data breach that is likely to result in a risk to the rights and freedoms of individuals, we will notify the relevant supervisory authority within 72 hours of becoming aware of the breach. If the breach is serious, we will also inform the affected individuals.

### 13. Data Protection Officer (DPO)

The Scalabrini Fathers Company will appoint a Data Protection Officer (DPO) if required by law or based on the size of data operations. The DPO will be responsible for overseeing data protection strategies and ensuring compliance with GDPR requirements.

# 14. Training and Awareness

All staff and volunteers handling personal data will receive appropriate training on data protection principles and procedures to ensure compliance with this policy.

# **15. Review of Policy**

This policy will be reviewed and updated regularly to ensure it reflects current legal requirements and best practices. Changes to the policy will be communicated to all relevant stakeholders.

### **Contact Information:**

For any questions or concerns about this policy or your personal data, please contact us at: 20 Brixton Road London SW9 6BU - TEL 02077358235 – scalamission@gmail.com www.scalabrinilondon.co.uk