

New Leaf Sustainable Development Ltd Data Protection Policy



Policy Definitions:

NLSD means New Leaf Sustainable Development Ltd.

GDPR means the General Data Protection Regulation

Responsible Person means [name of person] who is the person responsible for data protection within the Network

Register of Systems means a register of all systems or contexts in which personal data

1. Data protection principles

New Leaf Sustainable Development Ltd (NLSD) is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

- a) Processed lawfully, fairly and in a transparent manner in relation to individuals;
- b) Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- c) Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d) Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that is inaccurate, having regard to the purposes for which it is processed, is erased or rectified without delay;
- e) Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed;
- f) Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

2. General provisions

- a) This policy applies to all personal data processed by NLSD.
- b) The Responsible Person shall take responsibility for NLSD's ongoing compliance with this policy
- c) This policy shall be reviewed annually

3. Lawful, fair and transparent processing

To ensure its processing of data is lawful, fair and transparent, NLSD shall maintain

- a) Register of Systems.
- b) The Register of Systems shall be reviewed at least annually.
- c) Individuals have the right to access their personal data and any such requests made to the Network shall be dealt with in a timely manner

4. Lawful purposes

- a) All data processed by NLSD must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests (see ICO guidance for more information).
- b) NLSD shall note the appropriate lawful basis in the Register of Systems.
- c) Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- d) Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the Network's systems.

5. Data minimisation

- a) The Charity shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- b) If a Member chooses not to renew their membership NLSD will retain their personal data / contact information for a further year but will then delete it if that former Member does not wish to renew their membership.
- c) Personal data that is stored by NLSD in relation to contractor agreements, bank details etc. must only be retained for the period of time recommended for accounting purposes, currently recommended as being no longer than 6 years.

6. Accuracy

- a) NLSD shall take all reasonable steps to ensure personal data is accurate.
- b) Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date. Personal and business contact information will be updated by the Responsible Person within a week of being informed of the changes.

7. Security

- a) NLSD & all personnel acting on behalf of NLSD shall ensure that personal data is stored securely using modern software/hardware that is kept-up-to-date. This applies to data stored digitally and on paper / hard copies.
- b) Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c) When personal data is deleted this should be done safely so that the data is irrecoverable
- d) Appropriate back-up and disaster recovery solutions shall be in place.

8. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, NLSD shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the Information Commissioner's Office (ICO).

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