

The Trails Trust **GDPR Internal Policy**

Grounds for lawful processing:

We are processing personal data on the basis of “Contractual Arrangements” on the basis that we contract with the members of our Company Limited by Guarantee to provide them newsletters and information during the year in return for the subscription fee. We do not use the data for any marketing purpose.

Data flow:

Members of the Company provide their personal data when applying for or renewing their membership.

This data is entered onto a spreadsheet held by the Project Officer.

The Project Officer also holds witness statements submitted by individuals which includes their name and address.

The spreadsheet is saved on an external encrypted pen drive, with access only by the Project Officer

The paper copies of the data are securely disposed of when the changes have been updated on the spreadsheet

The data is continually updated for any notified changes or when members renew

Data access request:

If a request is received, it should come to the Project Officer who will provide the data held to the applicant by email preferably, or by other means if requested.

Data will be provided for the request within 40 days of receipt

Data Protection Officer:

Under the GDPR, you must appoint a DPO if:

- you are a public authority (except for courts acting in their judicial capacity);
- your core activities require large scale, regular and systematic monitoring of individuals (for example, online behaviour tracking); or
- your core activities consist of large scale processing of special categories of data or data relating to criminal convictions and offences.

We have decided in not to appoint a DPO because none of the above apply and Given the size of the Trust and the amount of data held, we do not feel it is necessary to appoint a Data Protection officer.

Personal data breaches:

If a personal data breach is identified, we will follow the procedures laid down by the ICO.

The Project Officer will report the breach to the ICO within 72 hours of becoming aware of the breach, unless it is considered that it is unlikely to result in a risk to the individual

If the breach is likely to result in a high risk to the rights and freedom of the individuals, the Project Officer will notify the individual without undue delay.