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## **DATA PROTECTION POLICY SUMMARY**

18/05/2018

This document outlines how The Ditchley Foundation processes and manages personal data. It:

- identifies our data controller and designated data protection officer;
- provides our lawful basis for processing personal data;
- outlines the scope of personal data we hold and process;
- outlines the scope of the special category personal data we hold and process;
- describes and justifies our data retention policy;
- shows how we intend to respond to Subject Access Requests; and
- contains a copy of our privacy notice.

### **1. Data Controller and Data Protection Officer**

The Ditchley Foundation (Ditchley) is registered with the Information Commissioner's Office (ICO) as a Data Controller. Ditchley has appointed Katie Williams, Major Events and Projects Lead as Data Protection Officer.

### **2. Lawful basis for processing**

Data is processed primarily under the lawful basis of legitimate interests. It has a limited privacy impact.

We undertake to always act within the reasonable expectations of any individuals about whom we hold personal data.

### **3. Data we hold**

As of 18<sup>th</sup> May 2018, Ditchley's database holds information on approximately 34,000 individuals.

Data is stored electronically and securely on our computer system or in, the case of personnel records, in locked cabinets.

#### Core activity

Ditchley uses a CRM (Customer Relationship Management) System, to manage its programme of events and activity. This information primarily includes but is not limited to:

- Names, addresses and email addresses.
- Telephone numbers.

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#### Fundraising

Ditchley also uses its CRM, to record donations and other gifts and generate gift aid reports.

This information primarily includes but is not limited to:

- Names, addresses and email addresses.
- Telephone numbers.
- Gift date, amount and whether gift aided.

#### Staff

In addition, Ditchley stores details of all personnel according to its legal obligations electronically using Sage, Xero and in paper format in locked cabinets. This information predominantly includes but is not limited to:

- Names, addresses and email addresses.
- Telephone numbers.
- National Insurance Numbers, Passport Numbers, Driver Licence Numbers.

A more detailed statement regarding the privacy policy applying to staff data may be found on the Ditchley website: [www.ditchley.co.uk](http://www.ditchley.co.uk).

### **5. Data retention policy**

All data we hold has a limited privacy impact and will be retained for the purposes of contacting you in the course of our normal activity and for historical, statistical or research purposes as outlined above unless its disposal is requested.

### **6. Subject Access Requests**

We will comply with Subject Access Requests in line with the guidance given by the ICO.

- We will respond as quickly as possible, within 30 calendar days.
- We will request verification of the identity of any individual making a request, and ask for further clarification and details if needed.
- Data subjects have the right to the following:
  - To be told whether any personal data is being processed
  - To be given a description of the personal data, the reasons it is being processed and whether it will be given to other organisations or people.
  - To be given a copy of the information comprising the data, and given details of the source of the data where this is available.

### **7. Privacy notice**

Ditchley will undertake to ensure that all individuals for whom we hold data can have the opportunity to read our privacy notice. We will:

- Publish our privacy notice on the website at [www.ditchley.co.uk](http://www.ditchley.co.uk)
- Add a link to our privacy notice to staff email signatures.