



SJP CHARITY TRUST LIMITED

VOLUNTEER AND TRUSTEE DATA PROTECTION

Volunteer and Trustee Privacy

SJP Charity Trust Limited (“the Company”) takes protection of the privacy of our volunteers, former volunteers, contractors and trustees (“Data Subjects”) very seriously.

The Company collects and processes information relating to Data Subjects relating to their working relationship with the Company (“Personal Data”).

The Company collects and processes Personal Data in compliance with applicable data protection laws, including the General Data Protection Regulations.

1. Notice and Choice

The Company provides Data Subjects with notice disclosing why Personal Data is collected and how it will be used. Personal Data is collected and used fairly and lawfully and in accordance with this Policy and the notices provided.

The Company collects and processes Personal Data only for purposes of administering the working relationship with Data Subjects, for carrying out of its lawful and charitable activities or when required by law.

The Company may disclose Personal Data to third parties only for purposes stated above. Examples of the types of third parties to whom the Company may disclose Personal Data include governmental entities, where required. The Company may also disclose Personal Data for the administration of any volunteer benefits, training, marketing, performance management, security, data collection and similar matters.

The Company will seek consent from Data Subjects before using the Personal Data for any other purpose, apart from purposes for which the Company is required to process data by any legislative or regulatory requirement.

The Company will obtain the Data Subject’s prior written consent before processing Sensitive Personal Data, except where consent is not required under applicable law.

2. Onward Transfer

In the event that the processing of Personal Data is outsourced by the Company to a third party, the Company will select reliable third parties and processing will be subject to written agreements between the Company and the third parties processing the data. These written agreements specify the rights and obligations of each party and will provide that the third party has adequate security measures in place and will process Personal Data only on the specific written instructions of the Company. The Company may also transfer Personal Data to third parties as required by law or legal instrument, to protect the Company’s legal rights or assets, to facilitate acquisition or disposition of Company businesses, and in emergencies where the health or safety of a person is endangered.

The Company does not sell, rent, share, trade or disclose any Personal Data it keeps relating to a Data Subject to any other parties without the prior written consent of the Data Subject, except for

entities within the Company and any suppliers or vendors which the Company has engaged to provide services and are involved in the processing of Personal Data on the Company's behalf.

Personal data will not be transferred to a country or territory when collected in a country or territory that considers the receiving country or territory to having inadequate data protection law(s), unless adequate measures are in place to protect the rights and freedoms of data subjects in relation to the processing of personal data.

3. Access and Data Integrity

Data Subjects have the right to request access to Personal Data relating to them held by the Company. Upon request, and after providing proof of identity, individuals will be given access to their Personal Data as required by applicable law.

The Company shall process access requests in the ordinary course of business and pursuant to applicable law, and will ensure that any reasonable requests for information will be handled promptly and fairly.

The Company will exercise reasonable efforts to ensure that Personal Data is accurate, adequate, relevant, and not excessive for the purposes for which it is processed.

The Company will exercise reasonable efforts to ensure that Personal Data is retained for no longer than is necessary for the purpose for which it is being processed.

4. Security

The Company implements technical, physical, and organisational measures to protect Personal Data against accidental or unlawful destruction, or accidental loss or alteration, or unauthorised disclosure or access (in particular where the process involves transmission of Personal Data over a network).

5. Treatment of Sensitive Personal Data

"Sensitive Personal Data" for the purposes of this Policy means any Personal Data relating to a Data Subject's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, data concerning health or sex life, criminal record data, National Insurance and/or PAYE numbers and other national identifier numbers.

Access to Sensitive Personal Data will be limited to Company volunteers and third-party processors that:

- the Company authorises to have access to Sensitive Personal Data;
- need access to such data to perform normal job responsibilities or to provide services to the Company; and
- are bound by company policy, contract or other legal obligation to use and disclose the data only as authorised by the Company.

Sensitive Personal Data must only be used as needed to satisfy the required responsibilities of the personnel authorised to access it.

The Company takes compliance with its data protection obligations very seriously. Volunteers will receive training regarding data privacy rights and obligations, as appropriate.

If you have any questions or concerns regarding this Policy or the Company's privacy policies and practices, please email: data@promsatstjudes.org.uk.