



Data Protection Principles

Introduction

This document has been produced following the introduction, with effect from 25th May 2018, of enhanced data protection regulations throughout the European Union as specified within the General Data Protection Regulation, commonly referred to as GDPR. It sets out the general principles of data protection and how the Sarah Groves Foundation (the Foundation) applies them.

Policy Statement

The Foundation is committed to providing you with a safe, secure and user-friendly experience whether your dealings with us are as a fundraiser, a beneficiary of our grant distribution programme, a supplier, the media or in any other capacity whatsoever.

Who We Are

The Sarah Groves Foundation
A Charitable Trust registered in Guernsey as Charity Number CH445
Member of the Association of Guernsey Charities

Registered address:

Rohais Manor
St Andrew's
Guernsey GY6 8YX

Trustees (as at 25th May 2018)

Vic Groves (Managing Trustee)
Kate Groves
Ben Groves
Peter Morrey
Sarah Steel

Contact points:

By email to: infor@sarahgroves.org

By phone to: 07781 156743

In writing to the Registered Address

Why We Collect Information

We maintain personal data for contact with:

- The media
- Organisations who benefit from our grant-giving programme



Data Protection Principles

- Fundraisers
- Individuals in the normal course of our business

We do not currently collect data, either through our website or by other means, for the purposes of selling. Information collected through our website is via an enquiry form which directs an email to info@sarahgroves.org.

Data Protection Policy

As with all organisations in the Bailiwick of Guernsey, and indeed elsewhere, which hold personal data on individuals, it is incumbent on the Foundation to adhere to relevant rules and legislation in force from time to time to ensure suitable protection is provided to individuals, generally known as Data Subjects, in respect of confidential and sensitive personal data held by the Foundation for legitimate reasons.

This document sets out the general Principles of the data protection law, and their relevance in the context of the Foundation's business, and the Procedures under which the Foundation and its officers will collate and handle personal data when required to do so.

This Data Protection Policy has been agreed by all Trustees of the Foundation and is effective from 25th May 2018.

The Sarah Groves Foundation has nominated Vic Groves, Managing Trustee as the Trustee responsible for this Policy, with oversight of the operation of the data handling procedures as outlined hereunder.

It should be noted that any breaches arising under these procedures at any time, whether inadvertent, mistake or advertent must be reported immediately to Vic Groves to consider any corrective action required and onward reporting if appropriate.

Responsible Officer: Vic Groves
Email: Vic.Groves@outlook.com
Telephone: 07781 156743

Please note that a separate document sets out in concise terms the Foundation's Privacy Policy, which is available upon request and on our website www.sarahgroves.org

Data Protection Principles

The over-riding principles of Data Protection equate in simple terms to:

1. Only hold personal data required for a specific purpose, and only use it for that purpose
2. Keep the data secure
3. Allow access on a need-to-know basis
4. Ensure the data subjects are aware of what the personal data is being used for, and allow them free access on request
5. Maintain the data only as long as necessary, then destroy (unless over-riding reasons apply)



Data Protection Principles

6. Keep the data up to date and accurate.

Personal data held at any time is normally limited to the following information

1. Name
2. Telephone number
3. Email address

In some circumstances, where more detailed personal data is required for medical, legal, insurance or travel purposes, some or all the following information will be held by the Foundation:

1. Date of Birth
2. Passport details
3. Medical conditions,
4. Allergies

All such personal data is subject to proper handling by the Foundation. In general terms and always, the following principles will be borne in mind and complied with:

1. Data Processing: must be fair, lawful and transparent
2. Purpose: data must be held for the required purpose only and cannot be used for other purposes
3. Data Minimisation: the minimum amount of personal information should be held for the specific purpose required and must be relevant to that purpose
4. Accuracy: data should be kept up to date as far as possible, and either erased or rectified when appropriate or no longer required
5. Data Retention: data should be retained no longer than necessary
6. Data Security: data to be held securely in a protected environment, with access only on a need-to-know basis
7. Accountability: the designated controller/responsible person must, if required to do so, demonstrate adherence to rules at all times
8. Data Breaches: in the event of any breach of data security, this will be reported to the responsible officer who will determine what action needs to be taken, which could involve change of data handling procedures, training, and a report to the Data Protection Commissioner if deemed appropriate.

Data Handling Arrangements

Personal data is not shared outside the Foundation unless authorised in advance.

Data Subject Requests

Under the data protection law, each Data Subject is entitled to ask for copies of the personal data held on them by the Foundation.



Data Protection Principles

The Foundation is obliged to provide copies of the relevant data within **one month** of the request being received.

Data Subject leaves the Foundation

An over-riding principle of data protection law is for Data Controllers to hold individual data only for the specified purpose and only for so long as required to meet the requirements of the Foundation. The data subject can request that their data is destroyed

Data Breaches

Certain types of data breach must be reported to the Data Protection authorities in Guernsey (the Data Protection Commissioner), but this is only required in cases where the breach could result in discrimination, damage to reputation, loss of confidentiality or perhaps social disadvantage. The responsible officer will make the determination on a case by case basis.

The Data Protection Commissioner will also handle any complaints raised by a Data Subject on the handling by the Data Controller of any personal data held on that individual.

Data Processor

Currently the Foundation does not use or indeed have a requirement for a separate Data Processor to process the personal data held on individuals.

Information Provided to Data Subjects

Data protection law requires certain information to be given to Data Subjects so that those Data Subjects are properly informed on relevant matters. The important point to remember is that the Data subjects have rights of access to and security of their personal data, and can request access to their data, make formal complaints about the handling of their data, and have the right for the data to be deleted when no longer required (the Right to be Forgotten).

Foundation Responsibility

The Foundation acknowledge the incumbent responsibilities in connection with the holding and processing of personal data as required under data protection law.

This Policy will be reviewed on a regular basis and amended in the light of changes in data protection law or general practice.

Vic Groves
Managing Trustee
May 2018