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# Rutherglen and Cambuslang Foodbank

# DATA PROTECTION (GDPR) POLICY

**Introduction**

Rutherglen and Cambuslang Foodbank is registered with the Information Commissioner as a controller ZA338499 and is governed by the Data Protection Act 2018, the EU General Data Protection Regulation (GDPR) and the Privacy and Electronic Communications Regulations 2003 (PECR).

**Who this policy applies to**

Rutherglen and Cambuslang Foodbank employees, trustees and volunteers are required to adhere to this policy which is designed to protect the personal data of Rutherglen and Cambuslang Foodbank data subjects - our supporters, volunteers, employees and trustees.

**Key definitions**

Data protection law applies to how we process people’s personal information. The key terms that we need to understand are:

**Controller** – Rutherglen and Cambuslang Foodbank is a controller as it collects and decides how personal information will be used.

**Principles** – These are the rules that we must follow when processing personal information

**Processing** - This is what we do with personal information. It includes how we collect, record, store, share and use personal information

**Personal information** – This includes personal data and special category personal data

**Personal data** - This is information about people and held in computer systems, mobile devices including laptops, tablets, telephones, or in manual records such in paper files and notebooks. For example, name, address, date of birth, bank account details, interests

It also includes opinions about a person. For example, notes on how you think someone has behaved, performed or appears

**Special category personal data** – this is information about a person’s health, religion, political opinion, trade union membership, race or ethnic origin, sexuality

A **data subject -** this is the person whose personal information is being processed. For example, a supporter, employee, volunteer, trustee

A **privacy policy** – this is how we inform people about how their personal information will be used. Rutherglen and Cambuslang Foodbank privacy policy is provided on our website.

A **privacy notice/statement** – this is a short notice when we collect personal information from people to inform them how their personal information will be used and to look at our privacy policy for more detail

**Data processor** – this is an organisation that we use to process personal information on behalf of the Trust. For example, a print and mailing house

**Information Commissioner’s Office** (ICO) - this is the government body responsible for enforcing data protection law in the UK

**Data protection principles**

All staff, trustees and volunteers are responsible for complying with the principles of data protection legislation which states that personal information must be:

1. Collected and processed in a fair, lawful and transparent way
2. Used only for the reasons it was collected
3. Relevant and not excessive
4. Kept accurate and up to date, and corrected or deleted if there are mistakes
5. Kept for no longer than it is needed
6. Kept safe to protect it from being lost, stolen or used inappropriately
7. Processed in accordance with people’s rights

In addition, the GDPR provides rules relating to the transfer of personal data to countries outside of the European Economic Area.

**Data subjects**

Rutherglen and Cambuslang Foodbank’s data subjects include supporters, employees, volunteers, trustees and beneficiaries.

**Data processing purposes**

Rutherglen and Cambuslang Foodbank needs to process personal information about our different data subjects to:

* Process donations and gift aid claims
* Process legacies and pledges
* Enable supporters to fundraise for us
* Enable supporters to participate in events
* Manage relationships with our supporters
* Provide supporters with information about us and the work that we do
* Manage marketing and communication preferences of our supporters
* Provide support to people who need to use the food bank
* Develop case studies and stories about our beneficiaries to promote and report on the work that we do
* Recruit and employ members of staff
* Recruit and manage volunteers
* Fulfil our legal and governance obligations as a registered charity and company.

**Legal basis for processing personal information**

Rutherglen and Cambuslang Foodbank’s legal basis for processing personal information is documented in detail in our ‘Privacy Statement’ Appendix 1. Personal information is processed with consent where appropriate, in order to meet our legal obligations as an employer and registered charity and for our legitimate interests.

Rutherglen and Cambuslang Foodbank may process some personal information based upon our legitimate interests. This is where the processing is required to fulfil our organisational objectives, is not to the detriment of our data subjects, and will not cause them damage or distress. We undertake legitimate interest assessments to balance the rights and interests of our data subjects with that of Rutherglen and Cambuslang Foodbank in order to make a judgement as to whether the legitimate interest condition applies to our processing.

**Responsibilities of staff and volunteers**

Rutherglen and Cambuslang Foodbank’s Data Protection Lead, who is also Foodbank Manager, is required to:

1. Provide compliance advice to staff
2. Ensure that staff receive appropriate data protection training and guidance
3. Ensure that Rutherglen and Cambuslang Foodbank’s data protection policies and documents are appropriate and up to date
4. Be the focal point for the administration of any subject access requests
5. Deal with data subject rights in relation to erasure, objection, restriction and rectification that staff feel unable to manage themselves
6. Log and assess all personal data breaches at Rutherglen and Cambuslang Foodbank
7. Refer data breach assessments to the board of Trustees for a final decision on whether they should be reported to the ICO
8. Renew and ensure that Rutherglen and Cambuslang Foodbank’s notification with the ICO is accurate
9. Keep a central register of all organisations that Rutherglen and Cambuslang Foodbank shares personal information with
10. Advise staff on the interpretation of this policy and guidelines and to monitor compliance with the policy.

*All staff and volunteers are responsible for:*

1. Working in compliance with the data protection principles as set out in this policy
2. Ensuring that any personal information that they provide to Rutherglen and Cambuslang Foodbank in connection with their employment, volunteering or other contraction agreement is accurate
3. Informing Rutherglen and Cambuslang Foodbank of any changes to any personal information which they have provided, e.g. changes of address
4. Responding to requests to check the accuracy of the personal information held on them and processed by Rutherglen and Cambuslang Foodbank.

**Data subject rights**

Rutherglen and Cambuslang Foodbank respects the rights of its data subjects including the right to:

* To be informed –we do this by including appropriate privacy notice information when collecting personal information
* Subject access - the right to view their personal information which we hold
* Object and / or withdraw consent - where the processing of personal data could cause them significant damage or distress.
* Rectification - we must correct any inaccurate or incomplete personal information when asked
* Erasure - deletion or the removal of their personal information where there is no compelling reason for its continued processing

**Data security**

It is the responsibility of all staff and volunteers authorised to access personal data processed by Rutherglen and Cambuslang Foodbank to ensure that data, whether held electronically or manually, is kept securely and not disclosed unlawfully, in accordance with this Policy. Unauthorised disclosure will usually be treated as a disciplinary matter and could be considered as constituting gross misconduct in some cases.

**Policy awareness**

Data protection awareness will be included as part of induction. Changes to policy on data protection policy or guidance will be circulated to all staff and volunteers. All staff and volunteers are expected to be familiar with and comply with the policy at all times.

**Redress**

Anyone who considers that this policy has not been followed in respect of personal data about themselves should raise the matter with the Data Protection Lead.

**Status of this policy**

This policy does not form part of the formal contract of employment, but it is a condition of employment that employees will abide by the rules and polices made by Rutherglen and Cambuslang Foodbank from time to time.

Compliance is the responsibility of all staff and volunteers. Any breach of this policy may lead to disciplinary action being taken, or even a criminal prosecution.

Any questions or concerns about the interpretation or operation of this policy should be taken up with the Data Protection Lead (Foodbank Manager).

**Appendix 1**

**Privacy Policy (and Record Keeping Information)**

Rutherglen and Cambuslang Foodbank is a data controller registered with the UK [Information Commissioner’s Office](https://ico.org.uk/) registration number ZA338499.

Keeping your personal information safe is very important to us. We are committed to complying with privacy and data protection laws and being transparent about how we use personal data.

We have policies, procedures and training in place to help our people understand their data protection responsibilities and follow the principles of data protection.

We have a nominated member of staff who serves as our Data Protection Lead. If you have any questions regarding our Privacy Policy, please email   
 manager@rutherglencambuslang.foodbank.org.uk

This privacy policy relates to personal information that Rutherglen and Cambuslang Foodbank collects and uses. We are an independent charitable organisation which is part of the Trussell Trust Foodbank Network. We share personal information about food bank use with the Trussell Trust which is a separate data controller. The Trussell Trust directly supports over 1200 food bank centres throughout the UK which together represent the Foodbank Network. For more information about who we share your personal data with please visit the “Sharing personal information” section below.

**How we collect personal information**We may collect your personal information from you directly when you:

* communicate with us for any reason, by post, telephone, text, email or via our website
* make a donation
* visit a foodbank or are referred to a foodbank
* participate in a survey or research
* work or make an application to work or volunteer for us
* agree to help us promote our work
* interact with us as a supplier, contractor, consultant or in any other capacity.

We may also collect personal information about you from other organisations. For example, from a referral agency like a doctor’s surgery, when you are referred to the food bank.

**The personal information that we collect**We only collect personal information that we genuinely need.

This may include:

* Contact details such as name, address, email address and phone numbers
* Date of birth and gender
* Nationality
* Any information that you give us relating to your circumstances and why you used a

foodbank

* Financial information that you provide to us, for example, when making a donation
* For job and volunteer applicants:
* your bank account details, tax and residency status
* references from previous employers or educational institutions
* contact details for your family members and next of kin
* qualifications
* information concerning your health and medical conditions
* information about your race, ethnicity and sexual orientation
* details of criminal convictions.

**Our legal basis for processing personal information**Our legal basis for processing personal information is usually for our legitimate interests, or your consent, or for the performance of a contract or to meet our legal obligations.

We may collect and use your personal data if it is necessary for our legitimate interest and so long as its use is fair, balanced and does not unduly impact your rights.

We will ask you to opt in to receiving marketing emails and text messages from us. You can unsubscribe from this at any time.

Usually we will only process sensitive personal data if we have your explicit consent. In extreme situations, we may share your personal details if we believe someone’s life is at risk.

We may process personal information because it is necessary for the performance of a contract to which you are a party (or to take steps at your request prior to entering a contract), or because we are legally obliged to do so, for example to meet employment or charity laws.

**Why we collect personal information**We collect and use personal information about people who use foodbanks, supporters, job applicants and volunteers for a number of reasons.

* **Assisting people that use foodbanks**We collect personal information from you directly if you have to use to use a foodbank, or via an organisation that refers you to a foodbank. Our legal basis for using this information is legitimate interest as we wish to respond to your need for help, and ensure that we are providing help when and where it is most needed. We will share this information with the Trussell Trust which works with us and other foodbanks to support our network and uses anonymised statistical data to campaign at a national level to challenge the structural issues that lock people into poverty.

* **Developing relationships with supporters**Our work is made possible because of the generosity of our supporters. We need a good understanding of our supporters so that we can communicate with them effectively and appropriately. We will only send you marketing communications via email or text where you have opted in to receiving them. You can unsubscribe from receiving these communications at any time by contacting manager@rutherglencambuslang.foodbank.org.uk
* **Processing donations**If you kindly make a donation to us (of food or money), we will use your personal information to collect your donation and maintain a record of our supporters. Our legal basis for using your personal information for this purpose is to fulfil our legitimate interest and fundraising objective. We are legally required by HMRC to collect some personal information if you choose to gift aid your financial donation.

## Dealing with complaints and appeals If a complaint is raised with us, we will process the personal information that is provided to us to manage and resolve the complaint or appeal. This may include sharing relevant information with the Trussell Trust or person that the complaint has been made about. Our legal basis for using personal information for this purpose is legitimate interest.

* **Promoting our work**We will use personal information that you share with us if you agree to help us promote our work. This might include photographs and videos. For example, we may use your information in case studies and stories that we publish or share with the media. We will only use your information for this purpose if you have given your consent for us to do so.
* **Carrying out surveys and research**If you choose to take part in one of our surveys, we will use the personal information that you provide to process the results of the survey and undertake analysis. We may use a university or work with The Trussell Trust to undertake analysis of survey responses. Survey results are anonymised before being shared or published.
* **Employee and volunteer administration and development**We will process personal information of our employees to fulfil our contract with them, and to meet our legal obligations as an employer. This includes payroll processing and the provision of training. We are required by law to share some financial information with the HMRC. We may also need to share some personal information with other organisations, for example solicitors, pension providers. Where you volunteer with us, we collect personal information to support the administration of your volunteering activity. Our legal basis for processing volunteers’ personal information is our legitimate interest or to meet our legal obligations. We share personal information about our employees and volunteers with the Trussell Trust to support the work of the Foodbank Network.
* **Recruitment**If you provide us with information about yourself, such as a résumé or curriculum vitae, in connection with a job or volunteer application or enquiry, we may use this information to process your enquiry. We will not store this information for any purpose other than that relating to your application. Our legal basis for using your information in this way is for our legitimate interest.
* **Undertaking safeguarding activities including Disclosure Scotland checks**When necessary, we process relevant personal information about employees and volunteers for safeguarding purposes. This might include undertaking PVG and other checks to identify any criminal and other activity we need to be aware of. It may be necessary to share some personal information with relevant authorities such as the police. Our legal basis for this processing is to meet our legal obligations.
* **Processing expenses**We will use your personal information including your bank account details to process expense claims. Our legal basis for using your information for this is for the performance of a contract.
* **Governance**We process relevant personal information about existing and potential trustee members for governance purposes. This might include undertaking PVG and other checks to identify any criminal and other activity we need to be aware of to ensure that we select appropriate trustees. Our legal basis for this processing is to meet our legal obligations with the Scottish Charity Regulator (OSCR) and Companies House.

**Sharing personal information**We will only share your personal information where we need to, where someone’s life is at risk or we are required to do so by law.

We may share your personal information with the Trussell Trust which is a separate data controller. The Trussell Trust directly supports over 1200 food bank centres throughout the UK which together represent the Foodbank Network. Where we share your personal information with Trussell Trust we will inform you as outlined in the section “Why we collect personal information” above. We have a data sharing agreement in place with Trussell Trust which sets out what information is shared, why and how we share the data.

We may share your personal information with third party organisations who will process it on our behalf, for example a mailing house, our website administrator or printers. We have data processing agreements or clauses in place with any data processors that we may use.

We may also share your information with our bank to process a payment; our professional advisers (such as our legal advisers) where it is necessary to obtain their advice; and our IT support and data storage providers.

Where required, we will process personal information to comply with our legal obligations. In this respect we may share your personal data to comply with subject access requests; tax legislation; for the prevention and detection of crime; and to assist the police and other competent authorities with investigations including criminal and safeguarding investigations.

**Transferring personal data outside of the European Economic Area (EEA)**At present we do not send personal information outside of the EEA. In the future we may use a supplier that hosts servers in another country, for example in the United States. Where we need to transfer personal information to countries or jurisdictions outside the EEA, we ensure they have a similar standard of data protection law in place to that of the UK. We put in place appropriate contracts and agreements with third parties to ensure an appropriate level of data protection and security.

**Cookies and aggregate information collected from our website**We use cookies on our website to store information about how you use our website. A cookie is a piece of data stored on the user’s computer tied to information about the user.  This enables us to make navigation easier and direct you to information that best corresponds to your interests and country.   
Aggregate information is collected from users using Google Analytics. This information includes users' Internet Protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, platform type, date/time of visit, number of clicks, error pages and number of unique visits. This information is not linked to personal profiles or to personally identifiable information provided by users. We use it to analyse visitor trends and use of our website, administer the website and to gather broad demographic information of our website users. To view our cookies policy visit <https://www.rutherglencambuslang.foodbank.org.uk/privacy-cookies-policy/>

**Your rights**If you no longer wish to receive communications about products and services from us, please contact manager@rutherglencambuslang.foodbank.org.uk

You can also inform us at any time that you do not want to receive emails that we may send to you about the products and services that we think will be of interest to you.

You also have the right to:

* Ask us for copies of your personal information.
* Tell us to change or correct your personal information if it is incomplete or inaccurate.
* Ask us to restrict our processing of your personal data or to delete your personal data if there is no compelling reason for us to continue using or holding this information.
* Receive from us the personal information we hold about you which you have provided to us, in a reasonable format specified by you, so that you can send it to another organisation.
* Object, on grounds relating to your specific situation, to any of our processing activities where you feel this has a disproportionate impact on you.

For all requests please contact us at [manager@rutherglencambuslang.foodbank.org.uk](mailto:manager@rutherglencambuslang.foodbank.org.uk) We will respond to any request within 28 days.

Please note that we may be entitled to refuse requests where exceptions apply, for example, if we have reason to believe that the personal data we hold is accurate or we can show our processing is necessary for a lawful purpose set out in this Privacy Policy.

**How long we keep your personal information**We will hold your personal information only for as long as is necessary. We will not retain your personal information if it is no longer required. In some circumstances, we may legally be required to retain your personal information, for example for finance, employment or audit purposes. We have in place a personal data retention schedule which sets out how long we keep your personal information for. Please contact [manager@rutherglencambuslang.foodbank.org.uk](mailto:manager@rutherglencambuslang.foodbank.org.uk) if you wish to see our personal data retention schedule.

**Changes to this policy**This Privacy Policy may change from time to time. We recommend that you contact [manager@rutherglencambuslang.foodbank.org.uk](mailto:manager@rutherglencambuslang.foodbank.org.uk) if you wish to check changes to this Policy.

**Making a complaint to the Information Commissioner’s Office**If you are not satisfied with our response to any query you raise with us, or you believe we are processing your personal data in a way which is inconsistent with the law, you can complain to the Information Commissioner’s Office whose helpline number is: **0303 123 1113.**

**Appendix 2**

**Rutherglen & Cambuslang Foodbank Personal Data Retention Schedule**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Data Subject** | **Document / Record** | **Where Data is recorded** | **Retention Period** | **Reason for retention** | Responsible person(s) for implementing/reviewing the retention policy |
| **EMPLOYEES** |  |  |  |  |  |
| Manager | Personnel records | local computer drive |  |  | Treasurer holds Contract and statutory documents |
|  | Accident reports | In locked filing cabinet in Foodbank Manager’s house. | 6 years after last entry or end of investigation | Reporting of Injuries, Diseases Regs 1995 | Foodbank Manager |
|  | Staff personnel records | local computer drive | 6 years after employment ceases | Limitations Act 1980 | Treasurer |
|  | Salary | local computer drive | 6 years plus current year | Taxes Management Act | Treasurer |
|  | Overtime records | local computer drive | 6 years plus current year | Taxes Management Act | Line Manager |
|  | Redundancy details & calculations | local computer drive | 6 years plus current year after employment ceases | Business requirement | Treasurer |
|  | Applications for jobs - unsuccessful candidates | In locked box in Secretary’s house. | 1 year after notifying the candidate | Defamation actions - Limitations Act | Convenor |
|  | Sickness Records | local computer drive | 3 years after end of each tax year | Statutory Sick Pay Regulations | Treasurer |
|  | Payroll documents | local computer drive | 6 years plus current year | Taxes Management Act 1970 | Treasurer |
|  | Income tax P45 | local computer drive | 6 years plus current year | Taxes Management Act 1970 | Treasurer |
|  | Notice to employer tax code P6 | local computer drive | 6 years plus current year | Taxes Management Act 1970 | Treasurer |
|  | Certificate of pay and tax deducted P60 | local computer drive | 6 years plus current year | Taxes Management Act 1970 | Treasurer |
|  | Notice of tax code changes | local computer drive | 6 years plus current year | Taxes Management Act 1970 | Treasurer |
|  | Annual return taxable pay & tax deducted | local computer drive | 6 years plus current year | Taxes Management Act 1970 | Treasurer |
|  | Record of pension deductions | local computer drive | 6 years plus current year | Pensions Act 1995 | Treasurer |
|  | Payroll & payroll control records | local computer drive | 6 years plus current year | Companies Act 2006/ Charities Act 2012/ Taxes Management Act 1970 | Treasurer |
|  | Insurance documents | local computer drive | 6 years plus current year | Limitation Act 1980 | Treasurer |
|  | Claims correspondence | local computer drive | 6 years after settlement | Limitation Act 1980 | Treasurer |
|  | Accident reports & relevant correspondence | local computer drive | 6 years after settlement | Limitation Act 1980 | Treasurer |
|  | Pension records | local computer drive | Permanently | Pensions Act 1995 | Treasurer |
|  | Details of current pensioners | local computer drive | 10 years after benefit ceases | Companies Act/ Pensions Act 1995/Commercial | Treasurer |
|  | Contribution records | local computer drive | Permanently | Companies Act/ Pensions Act 1995/Commercial | Treasurer |
| **VOLUNTEERS** |  |  |  |  |  |
| **Volunteers (Inc. Trustees)** | Volunteer application and record form | locked cabinet | 3 year after volunteering ceases | Limitations Act 1980 | Foodbank Manager |
| n/a | Medical records |  | 40 years from last entry | Control of lead regulations | n/a |
|  | Accident reports | Locked filing cabinet in Foodbank Manager’s house | 3 years after last entry or end of investigation | Reporting of Injuries, Diseases Regs 1995 | Foodbank Manager |
|  | personnel/volunteer training records | Password protected file on Foodbank Manager’s laptop | 6 years after volunteering ceases | Limitations Act 1980 | Foodbank Manager |
| n/a | Expense accounts |  | 6 years plus current year | Taxes Management Act | n/a |
| **PEOPLE WHO USE A FOOD BANK** | |  |  |  |  |
|  | Hardcopy foodbank voucher | Locked room at foodbank centres | 3 years after entered into DCS | Audit purposes against electronic records in DCS | Foodbank Manager |
|  | Contact record - inc. linked activity logs (e.g. referrals) | Data Collection System | 6 years after entry | to be able to effectively demonstrate charitable impact under charities Act 2012 | Foodbank Manager |
|  | Images & Case studies - Name, image, address, contact details, consent form | Local computer drive password protected | 3 years after date of consent | to be able to effectively demonstrate charitable impact and the difference services make to the lives of people who need to access services | Foodbank Manager |
| **REFERRAL AGENCIES** | |  |  |  |  |
|  | Name of Referral Agency Agency Address (including postcode) Main Contact details and Secondary contact details - as following for both; First Name Surname Email address Job Title Telephone | Data Collection System, locked filing cabinet | 2 years after their last issued voucher | To provide the food bank with contact details to follow up any voucher referral queries for at least one whole financial/calendar year + the remainder of any current financial/calendar year, providing the opportunity to correct or amend voucher records in an informed an accurate way.  This retention period also allows for any remaining food vouchers to be successfully fulfilled even during an extended period of inactivity without the need to remove the agency, potentially removing referral information from voucher data input. | Healthy'n'Happy |
| **SUPPORTERS** |  |  |  |  |  |
| Food donors | Supporter record - name, address, contact type | Locked box in Warehouse Manager’s house | 1 year after date of last donation | Charities Act 2012 | Warehouse Manager |
| Financial donors | Supporter record - name, address, giving history, relationship notes | Local computer drive, password protected | 6 years plus the current year after the last donation | Statutory authority: HMRC  Finance Act 1990 Taxes Management Act 1970 | Treasurer |
| Gift Aid donors | Gift Aid declaration - name, address, tax status | Local computer drive, password protected | 6 years plus the current year after the last donation | Statutory authority: HMRC  Finance Act 1990 Taxes Management Act 1970 | Treasurer |
| Event participants | Supporter record - name, address | Local computer drive, password protected | 2 years after event is completed | To be able to contact supporters about repeat or similar events | Fooddrive Coordinator |
| **OTHER DOCUMENTS / RECORDS CONTAINING PERSONAL DATA** | | | |  |  |
| Trustee meetings and committee minutes | names, register of interests | Local computer drives, paper files | Permanently | Charities Act 2012 | Trustee Secretary & Trustees |
| Health & Safety records | Health & Safety records (e.g. accident forms & occupational health assessments) | Locked room at foodbank centres | 6 years for general records | Health and Safety at Work Act 1974 and supporting RegulationsLimitation Act 1980Personal injury action must generally be commenced within three years of injury. However industrial injuries not capable of detection within that period of time may be substantially extended | Foodbank Manager |
| Emails containing personal data | email address and email message content | Google hosted user mailbox | 2 years | GDPR - e.g. information is required to ensure effectively able to respond to correspondence queries or complaints | Foodbank Manager |
| PVG checks | Certificate issue number, date of issue, details of relevant unspent convictions | Restricted access as sub folder within an individual's personnel file | 6 years after relationship ceases | The Police Act 1997 (Criminal Records) Regulations 2006 Retention will allow for the consideration and resolution of any disputes or complaints, or be for the purpose of completing safeguarding audits. | Convenor |
| Complaints information | names, contact information, nature of complaint | Locked filing cabinet | 6 years if the complaint is upheld  3 years after complaint is dealt with if not upheld | Limitation Act 1980 | Foodbank Manager |
| Safeguarding incident reports | names, address, nature and history of safeguarding concern | Locked filing cabinet | 75 years after last contact with the person who is subject of the disclosure | Information and Records Management Society guidance & in line with Section 35 of the Inquiries Act 2005 | Foodbank Manager |

**Appendix 3**

# Data Privacy Statement for Staff

**Personal data**

When you become an employee at the foodbank, the foodbank will keep some data about you.   
This is “personal data”, because it is about you as a particular person, and it can be linked to you.

**What personal data do we hold?**

The foodbank will keep personal data about you in several ways.  
1) your **application form** to work for the foodbank   
 this records your name, address, email address, phone number, if a DBS check was needed, and   
 any unspent criminal convictions

2) your **terms and conditions of employment**   
 this holds things like your name, address, email address, phone numbers, emergency contact details,   
 remuneration rate and pension arrangement

3) your **HMRC PAYE records**  
 these record your name, address, NI number, date of birth, and payments of salary, NI and tax

4) your **Pension payment records** if we have workplace pension arrangements in place for you, then we record your: name, address, NI number, date of birth, and pension contributions.

This is the only data the foodbank will usually hold about you. We do not get data about you in any other way.

There may also be information about you in emails.

In the event of a grievance, accusation or disciplinary matter, this will be recorded separately.

**How is your personal data kept safe?**

Where data is held about you on printed documents (such as your application form), this is kept in a a secure, locked filing cabinet at the Treasurer’s house. The key is only available to the Treasurer.

Where data is held about you in computer files (such as your terms and conditions of employment), these are kept on a password protected computer.   
HMRC PAYE and workplace pension data is accessed through a password-protected dedicated on-line service.

**What is your data used for?**

Your data is only used for purposes directly relating to your employment, particularly:

1. To contact you about your employment, if we need to
2. To contact the right person, if you have an accident or are taken ill when at work
3. To maintain PAYE records required by HMRC, and records required by any workplace pension provider

**Does the foodbank have a right to your data?**

Under Data Protection legislation, the foodbank needs to have a “lawful basis” for keeping your data, and for using it. There are several types of “lawful basis”. One of them is called “performance of a contract”.   
When you become an employee of the foodbank, we enter into a “contract” together. You undertake to fulfil your role; we undertake to properly look after you, other people, and our accounts. To do this, we need to hold data about you. That is why the lawful basis for holding your data is “performance of a contract”.

**Who can see your data?**

The only people who have access to your data are the trustees/committee and Treasurer. We are as careful as possible to make sure no one else has access to your data system.

**How long will your data be kept?**

Your data is kept while you are an employee of the foodbank.

If you stop being an employee, non-financial data will be kept for one year. This is so that we can contact you, if we need to ask you any questions about your time as an employee. It also helps us if you ask us for a reference, because you are applying for a job or another volunteer position. After a year these records will be destroyed, unless there is a reason why we are still in touch with you about your time as an employee  
Financial records – including PAYE and workplace pension – will be kept for six years after you leave. This is so we can prove that our accounts are correct, and that we have made the right payments.  
We may keep records of any grievance, dispute or accusation for up to six years.

**Who can you speak to if you have questions?**

If you have questions about your data, and what we do with it, you should contact the chair of trustees.

**What rights do you have?**

You have a number of rights under Data Protection legislation:

1. Right to be know what data we hold  
   You have a right to know what personal data we hold about you.   
   This Data Privacy Statement describes the data that we will hold. But you can ask if we have any other data about you which is not covered by this Data Privacy Statement.
2. Right to have a copy of the data we hold  
   You can ask for a copy of the data we hold about you. This is called a “subject access request”.   
   If you make a “subject access request”, we will give you a copy of all the data we hold about you.  
   We will do this within one month. If it helps, we will give you the data in a computer file.
3. Right to object  
   You can object if you think we are using your data in the wrong way.   
   You can also object if you think we don’t have “lawful grounds” for using your data.

We will give you a statement explaining why we use your data and explaining the “lawful grounds”.  
If you are still not happy, you can complain to the Information Commissioner’s Office.  
If we find we are using your data in the wrong way, we will stop immediately and stop it happening again.

1. Right to have your data corrected  
   If you think there is a mistake in your data, please tell us. You have a right to have it corrected.   
   We may need to check what is the correct data, but will put right any mistakes as soon as possible.
2. Right to be forgotten  
   We promise to remove your data after six years. You have a right for this to happen, because we don’t need to keep your data any longer than six years.

Finally, if anything happened to your data that could be a risk to you, we will do our best to tell you.

**Appendix 4**

# Data Privacy Statement for Volunteers

**Personal data**

When you become a volunteer at the foodbank, the foodbank will keep some data about you.   
This is “personal data”, because it is about you as a particular person, and it can be linked to you.

**What personal data do we hold?**

The foodbank will keep personal data about you on up to three documents:

1) your **initial contact information**  
this will record your name and contact details when you make contact with us about being a volunteer

2) the **application form** you filled in to request becoming a volunteer

this records your name, address, contact details, next of kin, emergency contact, availability and, where applicable, unspent criminal convictions.

In the event of a grievance, accusation or disciplinary matter, this will be recorded separately.

This is the only data the foodbank will usually hold about you. We do not get data about you in any other way.

**How is your personal data kept safe?**

Your data is kept in a secure, locked filing cabinet at the Foodbank Manager’s house. The key is only available to the Foodbank Manager. Electronic data is kept in password protected documents.

**What is your data used for?**

Your data is only used for purposes directly relating to your volunteering, particularly:

1. To work out the best volunteer opportunities for you
2. To contact you about your volunteering, if we need to
3. To make sure you get the right medical care, if you are taken ill when volunteering
4. To contact the right person, if you have an accident or are taken ill when volunteering
5. To know that you have signed a confidentiality agreement, have been told about health and safety, and/or have given permission to be photographed

**Does the foodbank have a right to your data?**

Under Data Protection legislation, the foodbank needs to have a “lawful basis” for keeping your data, and for using it. There are several types of “lawful basis”. One of them is called “performance of a contract”.

When you become a volunteer, you enter into a “contract” (or agreement) with the foodbank. You undertake to play your part as a volunteer; we undertake to look after you, and other people, properly. To do this, we need to hold data about you. That is why the lawful basis for holding your data is “performance of a contract”.

**Who can see your data?**

The only people who have access to your data are the committee/trustees, the rota coordinator or the foodbank manager. We are as careful as possible to make sure no one else has access to your data.

**How long will your data be kept?**

Your initial contact details will be kept on a password protected secure computer file. They will be deleted as soon as you send us a completed application form, or you have told us that you do not want to volunteer.

If we are unable to find a volunteer position for you, your application form will be kept for one year, unless you ask us to delete it sooner.

If you become a volunteer, then your data is kept for as long as you are a volunteer at the foodbank.

If you stop being a volunteer, we will keep your data for a further year. This is so that we can contact you, if we need to ask you any questions about your time as a volunteer. It also helps us if you ask us for a reference, because you are applying for a job or another volunteer position.

After a year your records will be destroyed, unless there is a reason why we still need to be in touch with you about your time as a volunteer.  
We may keep records of any grievance, dispute or accusation for up to six years.

**Who can you speak to if you have questions?**

If you have questions about your data, and what we do with it, you should contact the Foodbank Manager, email - [manager@rutherglencambuslang.foodbank.org.uk](mailto:manager@rutherglencambuslang.foodbank.org.uk)   
 phone – 07393 737030

**What rights do you have?**

You have a number of rights under Data Protection legislation:

1. Right to be know what data we hold  
   You have a right to know what personal data we hold about you.   
   This Data Privacy Statement describes the data that we will hold. But you can ask if we have any other data about you which is not covered by this Data Privacy Statement.
2. Right to have a copy of the data we hold  
   You can ask for a copy of the data we hold about you. This is called a “subject access request”.   
   If you make a “subject access request”, we will give you a copy of all the data we hold about you.  
   We will do this within one month. If it helps, we will give you the data in a computer file.
3. Right to object  
   You can object if you think we are using your data in the wrong way.   
   You can also object if you think we don’t have “lawful grounds” for using your data.  
   We will give you a statement explaining why we use your data and explaining the “lawful grounds”.  
   If you are still not happy, you can complain to the Information Commissioner’s Office.  
   If we find we are using your data in the wrong way, we will stop immediately and stop it happening again.
4. Right to have your data corrected  
   If you think there is a mistake in your data, please tell us. You have a right to have it corrected.   
   We may need to check what is the correct data, but will put right any mistakes as soon as possible.
5. Right to be forgotten  
   We promise to remove your data after six years. You have a right for this to happen, because we don’t need to keep your data any longer than six years.

Finally, if anything happened to your data that could be a risk to you, we will do our best to tell you.

**Appendix 5**

# Data Privacy Statement for Clients

**Personal data**

When you come to a foodbank for help, the foodbank will keep some data about you. This is “personal data”, because it is about you as a particular person, and it can be linked to you.

**What personal data do we hold?**

The foodbank will keep the data that is on your foodbank voucher(s). That means we will keep your name, address, and year of birth; the number of other adults and children in your household; and the reason you needed to come to the foodbank. We will also keep a record of who gave you the foodbank voucher.

If we can give you extra help, there may be extra things we need to ask you about, and will keep a record of.  
There may also be some notes on our data system about your visit. This is the only data the foodbank will hold about you. We do not get data about you in any other way.

**How is your personal data kept safe?**

Your data is kept in a secure database. This can only be accessed with a login and password. We require all users of the system to sign a “data protection statement”. This means they know they must keep your data safe, and only use it for the right purposes. All our other volunteers also have to sign a confidentiality agreement. We are as careful as possible to make sure no one else can log into the data system. For example, when a volunteer leaves the foodbank, we stop their access to the data system.

If you came to the foodbank with a printed voucher, your voucher will be kept separately. Printed vouchers are kept in a locked room. They are never left where someone could see them.

**What is your data used for?**

We use your data for three things:

1. We need to be able to check how many times you have been to a foodbank.
2. We need to keep some of your data so we can calculate the numbers of people coming to foodbanks, and the reasons they need to. This is so we can help other people understand how much foodbanks are needed and why people have to come to foodbanks for help.
3. If we can give you extra help, such as with benefits, there may be extra questions we need to ask you. This will be because we need particular information in order to know how to help you.

**Does the foodbank have a right to your data?**

Under Data Protection legislation, the foodbank needs to have a “lawful basis” for keeping your data, and for using it. There are several types of “lawful basis”. One of them is called “legitimate interests”.

The foodbank has a “legitimate interest” in keeping the data from your foodbank voucher.

This is so we can carry out the two main purposes described above – checking how many times clients visit the foodbank, and reporting on the need for foodbanks.

There is another type of “lawful basis” called “performance of a contract”. If we are to give you extra help, we may need particular information from you. We may need to ask you additional questions and record the answers. The lawful basis for this will be “performance of a contract”.

**Who can see your data?**

Your data can be seen by people from this foodbank who have been given a login and password for the data system. If you go to two foodbanks, people from both foodbanks will be able to see the data from all your foodbank visits – not just for the visits to their own foodbank.

Some agencies can refer you to a foodbank using an on-line system called “e-referral”. If an agency has done this for you, then the agency will also be able to see the data for your visit.

E-referral agencies and other foodbanks can also see the dates when someone with your name and postcode has been to a foodbank. They can’t see any more data, like your address or why you needed foodbank help.   
We will never give or sell your data to any other bodies.

**How long will your data be kept?**

Your personal data is kept for six years. After that, paper foodbank vouchers are destroyed, and your name and address are automatically removed from the data system.

Your vouchers and data are kept for six years. This is so we could prove we have acted properly as a charity, and used people’s donations in the right way. Charity law means we may need to be able to prove this.

**Who can you speak to if you have questions?**

If you have questions about your data, and what we do with it, you should contact the Foodbank Manager, email - [manager@rutherglencambuslang.foodbank.org.uk](mailto:manager@rutherglencambuslang.foodbank.org.uk)   
 phone – 07393 737030

**What rights do you have?**

You have a number of rights under Data Protection legislation:

1. Right to be know what data we hold  
   You have a right to know what personal data we hold about you.   
   This Data Privacy Statement describes the data that we will hold. But you can ask if we have any other data about you which is not covered by this Data Privacy Statement.
2. Right to have a copy of the data we hold  
   You can ask for a copy of the data we hold about you. This is called a “subject access request”.   
   If you make a “subject access request”, we will give you a copy of all the data we hold about you.  
   We will do this within one month. If it helps, we will give you the data in a computer file.
3. Right to object  
   You can object if you think we are using your data in the wrong way.   
   You can also object if you think we don’t have “lawful grounds” for using your data.  
   We will give you a statement explaining why we use your data and explaining the “lawful grounds”.  
   If you are still not happy, you can complain to the Information Commissioner’s Office.  
   If we find we are using your data in the wrong way, we will stop immediately and stop it happening again.
4. Right to have your data corrected  
   If you think there is a mistake in your data, please tell us. You have a right to have it corrected.   
   We may need to check what is the correct data, but will put right any mistakes as soon as possible.
5. Right to be forgotten  
   We promise to remove your data after six years. You have a right for this to happen, because we don’t need to keep your data any longer than six years.

Finally, if anything happened to your data that could be a risk to you, we will do our best to tell you.

**Appendix 6**

# Data Privacy Statement for Referral Agencies

**Personal data**

When your organisation becomes a referral partner for the foodbank, the foodbank will keep some data about you. This includes some “personal data” which relates to particular named people.   
We also keep data about clients you refer to the foodbank. There is a separate Data Privacy Statement for Clients. Please ask if you would like to see a copy of that Data Privacy Statement.

**What personal data do we hold?**

The foodbank will keep data about you in two ways:  
1) the **registration form** you filled in to become a referral agency   
 this records the name, address, email address, phone number, and name of principal contact at your   
 organisation; and the name, signature and role of personnel authorised to issue foodbank vouchers

2) our **on-line data system**

this records the name, address, email address, phone number, and name of principal contact at your   
organisation; and the name, job title and email address of any personnel authorised to make e-referrals to the foodbank

This is the only data the foodbank will usually hold about you. We do not get data about you in any other way.

There may also be information about you in emails.

**How is your personal data kept safe?**

Your registration forms are held in a locked cabinet at the Healthy’n’Happy offices. The key is only available to office staff at Healthy’n’Happy.

The digital data is kept in a secure on-line database. This can only be accessed with a login and password.   
We require all users of the system to sign a “data protection statement”. This means they know they must keep your data safe, and only use it for the right purposes.   
All our other volunteers also have to sign a confidentiality agreement.

We are as careful as possible to make sure no unauthorised person can log into the data system. For example, when a volunteer leaves the foodbank, we stop their access to the data system.

**What is your data used for?**

Your data is only used to

* Validate signatures on vouchers your organisation has issued
* Contact you if there is an important query about a client you have referred to the foodbank
* Send you replacement vouchers
* Keep in contact with you, for example to seek a meeting or invite your organisation to an event

**Does the foodbank have a right to your data?**

Under Data Protection legislation, the foodbank needs to have a “lawful basis” for keeping your data, and for using it. There are several types of “lawful basis”. One of them is called “performance of a contract”.   
When you become a referral agency foodbank, we enter into a “contract” together. You undertake to send people in genuine crisis to the foodbank with a completed voucher; we undertake to provide them with emergency food, and contact you if there is a problem. To do this, we need to hold data about you.   
That is why the lawful basis for holding your data is “performance of a contract”.

**Who can see your data?**

The only people who have access to your application forms are the foodbank manager, admin volunteers and the committee/trustees.   
Your data on the on-line system can only be seen by authorised people who have been given a login and password for the data system.   
We are as careful as possible to make sure no one else has access to your data.

**How long will your data be kept?**

Your application form will be kept while you are a referral agency for the foodbank.   
If you stop being a referral agency, we will destroy your application form and any other signatories’ forms.

We will also delete you from the online data system as an active referral agency.   
The on-line data system also records data from all foodbank vouchers. These will continue to show the name of the agency and the agency worker that issued a voucher, and their contact phone number. This is also recorded on the printed vouchers. These are kept for six years in case we need to evidence proper use of public donations.

**Who can you speak to if you have questions?**

If you have questions about your data, and what we do with it, you should contact the Foodbank Manager, email - [manager@rutherglencambuslang.foodbank.org.uk](mailto:manager@rutherglencambuslang.foodbank.org.uk)   
 phone – 07393 737030

**What rights do you have?**

You have a number of rights under Data Protection legislation:

1. Right to be know what data we hold  
   You have a right to know what personal data we hold about you.   
   This Data Privacy Statement describes the data that we will hold. But you can ask if we have any other data about you which is not covered by this Data Privacy Statement.
2. Right to have a copy of the data we hold  
   You can ask for a copy of the data we hold about you. This is called a “subject access request”.   
   If you make a “subject access request”, we will give you a copy of all the data we hold about you.  
   We will do this within one month. If it helps, we will give you the data in a computer file.
3. Right to object  
   You can object if you think we are using your data in the wrong way.   
   You can also object if you think we don’t have “lawful grounds” for using your data.  
   We will give you a statement explaining why we use your data and explaining the “lawful grounds”.  
   If you are still not happy, you can complain to the Information Commissioner’s Office.  
   If we find we are using your data in the wrong way, we will stop immediately and stop it happening again.
4. Right to have your data corrected  
   If you think there is a mistake in your data, please tell us. You have a right to have it corrected.   
   We may need to check what is the correct data, but will put right any mistakes as soon as possible.
5. Right to be forgotten  
   We promise to remove your data after six years. You have a right for this to happen, because we don’t need to keep your data any longer than six years.

Finally, if anything happened to your data that could be a risk to you, we will do our best to tell you.

**Appendix 7**

# Data Privacy Statement for Financial Donors

**Personal data**

If you give money to the foodbank for help via a Standing Order or a Gift Aid agreement, the foodbank will keep some data about you. This is “personal data”, because it is about you as a particular person, and it can be linked to you.

**What personal data do we hold?**

If you send us a Standing Order form, it will hold your name, address, email address, and bank account details.

If you send us a Gift Aid form, it will record your name, address, email address, and bank account details.

Both of these forms may also record that you are happy to receive communications from us.  
If you just send us money donations, our account records will just show your name, date and amount paid.

**How is your personal data kept safe?**

Forms are kept in electronic form in password protected documents on a password protected computer.

The information is also held in a spreadsheet. This file is password-protected and kept on a password-protected computer.  
From time to time we claim Gift Aid money back from the government. When this happens, another spreadsheet is created which lists all the people whose Gift Aid we are reclaiming. This spreadsheet is also password-protected and kept on a password-protected computer.

**What is your data used for?**

Your Standing Order form is used to tell your bank to make payments to the foodbank, and for our treasurer to keep track of those payments.

Your Gift Aid form is kept so that we can prove what Gift Aid money we can reclaim from the government.

**Does the foodbank have a right to your data?**

Under Data Protection legislation, the foodbank needs to have a “lawful basis” for keeping your data, and for using it. There are several types of “lawful basis”. One of them is called “performance of a contract”.   
When you sign a Standing Order or Gift Aid form, you enter into a “contract” (or agreement) with the foodbank. You undertake to pay funds to the foodbank; we undertake to report those funds accurately in our accounts, and to reclaim any Gift Aid money from the government.

Your Standing Order or Gift Aid form may have shown that you are happy to receive information from us. The lawful basis for sending you newsletters or similar communications would then be “legitimate interest”. If you have indicated that you are happy to receive information, then it is reasonable (“legitimate”) for us to regard you as a supporter, and send you information. There is a separate Data Privacy Statement for supporters.   
Newsletters or similar communications will always have an opt-out or “unsubscribe” option.

**Who can see your data?**

The only people who have access to your data are the treasurer, the foodbank manager and HMRC when reclaiming Gift Aid and Independent Auditor.   
We are as careful as possible to make sure no one else has access to your data.

**How long will your data be kept?**

Your Standing Order or Gift Aid form will be kept for as long as it is in operation.

You can cancel your Standing Order or Gift Aid agreement at any time.

Your forms will then be kept for six years. This is so we could prove that our accounts are correct. Charity law means we may need to be able to prove this.

**Who can you speak to if you have questions?**

If you have questions about your data, and what we do with it, you should contact the Foodbank Manager, email - [manager@rutherglencambuslang.foodbank.org.uk](mailto:manager@rutherglencambuslang.foodbank.org.uk)   
 phone – 07393 737030

**What rights do you have?**

You have a number of rights under Data Protection legislation:

1. Right to be know what data we hold  
   You have a right to know what personal data we hold about you.   
   This Data Privacy Statement describes the data that we will hold. But you can ask if we have any other data about you which is not covered by this Data Privacy Statement.
2. Right to have a copy of the data we hold  
   You can ask for a copy of the data we hold about you. This is called a “subject access request”.   
   If you make a “subject access request”, we will give you a copy of all the data we hold about you.  
   We will do this within one month. If it helps, we will give you the data in a computer file.
3. Right to object  
   You can object if you think we are using your data in the wrong way.   
   You can also object if you think we don’t have “lawful grounds” for using your data.  
   We will give you a statement explaining why we use your data and explaining the “lawful grounds”.  
   If you are still not happy, you can complain to the Information Commissioner’s Office.  
   If we find we are using your data in the wrong way, we will stop immediately and stop it happening again.
4. Right to have your data corrected  
   If you think there is a mistake in your data, please tell us. You have a right to have it corrected.   
   We may need to check what is the correct data, but will put right any mistakes as soon as possible.
5. Right to be forgotten  
   We promise to remove your data after six years. You have a right for this to happen, because we don’t need to keep your data any longer than six years.

Finally, if anything happened to your data that could be a risk to you, we will do our best to tell you.

**Appendix 8**

# Data Privacy Statement for Donor Groups

**Personal data**

When your organisation becomes a regular food donor for the foodbank, the foodbank will keep some data about you. This includes some “personal data”, which relates to particular named people.

**What personal data do we hold?**

The foodbank will keep data about you on an on-line data system.   
This will record the name of your group, and your main contact’s name, phone numbers, email address and postal address.

This is the only data the foodbank will usually hold about you. We do not get data about you in any other way.

There may also be information about you in emails.

**How is your personal data kept safe?**

The data is kept in a secure on-line database. This can only be accessed with a login and password.   
We require all users of the system to sign a “data protection statement”. This means they know they must keep your data safe, and only use it for the right purposes.   
All our other volunteers also have to sign a confidentiality agreement.

We are as careful as possible to make sure no unauthorised person can log into the data system. For example, when a volunteer leaves the foodbank, we stop their access to the data system.

**What is your data used for?**

Your data will only be used to contact you about food donations. For example, this could be to advise you of shortage items, to thank you for donations, or to prompt you about delivery arrangements for harvest or Christmas donations.

We may also use your data to send you newsletters or information about the work of the foodbank. There is a separate Data Privacy Statement for “Supporters”. Please ask if you would like to see a copy of that Data Privacy Statement.

**Does the foodbank have a right to your data?**

Under Data Protection legislation, the foodbank needs to have a “lawful basis” for keeping your data, and for using it. There are several types of “lawful basis”. One of them is called “performance of a contract”.

When you become a food donor group, we enter into a “contract” or relationship together. You undertake to make food donations to the foodbank; we undertake to give you information that will help you. To do this, we need to hold data about you. That is why the lawful basis for holding your data is “performance of a contract”.

If we send you newsletters or information about the work of the foodbank, the lawful basis for this is “legitimate interest”. As a supporter group, we believe that it is reasonable (“legitimate”) for us to keep you informed. Newsletters or similar communications will always have an opt-out or “unsubscribe” option.

**Who can see your data?**   
Your data on the on-line system can only be seen by authorised people who have been given a login and password for the data system.   
We are as careful as possible to make sure no one else has access to your data.

**How long will your data be kept?**

Your data will be kept while you are a donor group.   
If you tell us you have stopped being a donor group, we will delete your organisation’s data from the on-line system’s record of active donor groups.   
The data system will still record donation amounts and dates, but your contact details will not be kept.

**Who can you speak to if you have questions?**

If you have questions about your data, and what we do with it, you should contact the Foodbank Manager, email - [manager@rutherglencambuslang.foodbank.org.uk](mailto:manager@rutherglencambuslang.foodbank.org.uk)   
 phone – 07393 737030

**What rights do you have?**

You have a number of rights under Data Protection legislation:

1. Right to be know what data we hold  
   You have a right to know what personal data we hold about you.   
   This Data Privacy Statement describes the data that we will hold. But you can ask if we have any other data about you which is not covered by this Data Privacy Statement.
2. Right to have a copy of the data we hold  
   You can ask for a copy of the data we hold about you. This is called a “subject access request”.   
   If you make a “subject access request”, we will give you a copy of all the data we hold about you.  
   We will do this within one month. If it helps, we will give you the data in a computer file.
3. Right to object  
   You can object if you think we are using your data in the wrong way.   
   You can also object if you think we don’t have “lawful grounds” for using your data.  
   We will give you a statement explaining why we use your data and explaining the “lawful grounds”.  
   If you are still not happy, you can complain to the Information Commissioner’s Office.  
   If we find we are using your data in the wrong way, we will stop immediately and stop it happening again.
4. Right to have your data corrected  
   If you think there is a mistake in your data, please tell us. You have a right to have it corrected.   
   We may need to check what is the correct data, but will put right any mistakes as soon as possible.
5. Right to be forgotten  
   We promise to remove your data after six years. You have a right for this to happen, because we don’t need to keep your data any longer than six years.

Finally, if anything happened to your data that could be a risk to you, we will do our best to tell you.

**Appendix 9**

# Data Privacy Statement for Supporters

**Personal data**

There are many ways in which you can be a supporter of the foodbank. Some supporters receive newsletters or similar updates about the work of the foodbank. This Data Privacy Statement is for this group. In this Data Privacy Statement, the word “supporter” means someone who receives newsletters or similar updates.

There are separate Data Privacy Statements for volunteers, food donor groups and referral agencies. If you are in one of these groups, please also ask for its Data Privacy Statement, if you would like to see it.

**What personal data do we hold?**

If you are a supporter, we will hold your name and postal address, and/or email address and/or social media identity.

**How is your personal data kept safe?**

Your details are held in a spreadsheet. This file is password-protected and kept on a password-protected computer.

You might have made contact with us through our website, using the “stay in touch” facility, or the “contact us” page. If you have done this, your name and email address will also be stored on our website.

**What is your data used for?**

Your data is only used to send you newsletters, social media posts or other communication about the work of the foodbank. This may include requests for help with food donations, financial donations or volunteering help.

**Does the foodbank have a right to your data?**

Under Data Protection legislation, the foodbank needs to have a “lawful basis” for keeping your data, and for using it. There are several types of “lawful basis”. One of them is called “legitimate interest”. If you are a volunteer, or a member of a regular food donor group, or a referral agency, then it is reasonable (“legitimate”) for us to keep you informed about the work of the foodbank.

If you are not in one of those groups, we will not send you newsletters or other information unless you have agreed to be added to a mailing list. We will ask you clearly if you are happy to be added to a mailing list. You can say yes or no, or not reply. If you say yes, you will have given “consent” and we will record your details on the mailing list. The lawful basis for us to hold your data is then called “consent”.

We will not record your details on the mailing list unless you give consent.

**Who can see your data?**

The only people who have access to your data are the foodbank manager and admin volunteer.   
We are as careful as possible to make sure no one else has access to your data.

**How long will your data be kept?**

Your details will be kept as long as you are happy to receive newsletters or information.   
At any time you can tell us that you are withdrawing consent. If you do that, we will take your details off the mailing list. We may keep enough of your details to make sure we don’t send you any information by mistake.

**Who can you speak to if you have questions?**

If you have questions about your data, and what we do with it, you should contact the Foodbank Manager, email - [manager@rutherglencambuslang.foodbank.org.uk](mailto:manager@rutherglencambuslang.foodbank.org.uk)   
 phone – 07393 737030

**What rights do you have?**

You have a number of rights under Data Protection legislation:

1. Right to be know what data we hold  
   You have a right to know what personal data we hold about you.   
   This Data Privacy Statement describes the data that we will hold. But you can ask if we have any other data about you which is not covered by this Data Privacy Statement.
2. Right to have a copy of the data we hold  
   You can ask for a copy of the data we hold about you. This is called a “subject access request”.   
   If you make a “subject access request”, we will give you a copy of all the data we hold about you.  
   We will do this within one month. If it helps, we will give you the data in a computer file.
3. Right to object  
   You can object if you think we are using your data in the wrong way.   
   You can also object if you think we don’t have “lawful grounds” for using your data.  
   We will give you a statement explaining why we use your data and explaining the “lawful grounds”.  
   If you are still not happy, you can complain to the Information Commissioner’s Office.  
   If we find we are using your data in the wrong way, we will stop immediately and stop it happening again.
4. Right to have your data corrected  
   If you think there is a mistake in your data, please tell us. You have a right to have it corrected.   
   We may need to check what is the correct data, but will put right any mistakes as soon as possible.
5. Right to be forgotten  
   We promise to remove your data after six years. You have a right for this to happen, because we don’t need to keep your data any longer than six years.

Finally, if anything happened to your data that could be a risk to you, we will do our best to tell you.

Signed…………………………………… Date ……**April 2021**

Name: Heather Buchan Position: Convenor, Rutherglen and Cambuslang Foodbank  Date to be reviewed…… **May 2024**

Registered Charity Number: SC 044594 Registered in Scotland