

Shetland Community Benefit Fund

 Data Protection Policy

**1. Introduction**

1.1 Shetland Community Benefit Fund Limited (SCBF) is registered with the Information Commissioner’s Office (ICO) under registration number ZA833366.

1.2 The SCBF Data Protection Policy concerns the processing of Personal Data produced, acquired or maintained by the organisation and its employees in the course of SCBF business.

1.3 The SCBF acknowledges its responsibilities concerning the processing of Personal Data and will endeavour to ensure that its activities align with the General Data Protection Regulation and associated legislation.

1.4 All staff, officers and Directors are required to respect the requirements of legislation in this domain and ensure that they do not undertake activities that are contrary to those requirements.

**2. Audience**

2.1 This policy is for the attention of all staff, officers and Directors, in so far as they are required to process personal information during the course of SCBF work.

2.2 The rights of individuals apply to any person about whom the SCBF holds Personal Data.

**3. Purpose**

3.1 This document represents the SCBF’s commitment to the appropriate processing of Personal Data and to respect the rights of individuals in relation to their Personal Data.

**4. Definitions**

4.1 The definitions of ‘Personal Data’ and ‘Special Category Data” used by the SCBF are those provided in the General Data Protection Regulation.

**5. Lawful Processing**

5.1 The General Data Protection Regulation requires the SCBF to set out why it’s processing of Personal Data, and Special Category Data is lawful. The SCBF will maintain Grant Application and Staff Privacy Statements containing this information.

**6. Data Protection Officer**

6.1 As Data Controller that is not likely to handle significant Special Category Data the SCBF is not required to designate a Data Protection Officer who holds the authority and has the responsibilities detailed in Articles 37, 38 and 39 of the General Data Protection Regulation.

6.2 SCBF will select a Director to oversee the SCBF’s General Data Protection Regulations obligations to data subjects and compliant processing of data. This is the SCBF Data Protection Coordinator.

**7. Data Controller**

7.1 The SCBF will normally be the data controller for Personal Data processed further to its activities. It may also act as a joint data controller or data processor where appropriate.

**8. Responsibilities**

8.1 The SCBF Chair has overall responsibility for Data Protection Compliance.

8.2 The Data Protection Coordinator is responsible for updating the Privacy Statements, amending data collection forms, amending agreements which involve data sharing, advising on GDPR, responding to data access requests or data corrections, and reporting breaches to ICO where necessary.

8.3 The SCBF Board of Directors is responsible for ensuring that all staff, officers and Directors who will be handling Personal Data, are trained in General Data Protection Regulation legislation and that sufficient policies and procedures are in place.

8.4 The SCBF Board of Directors will ensure that the processing of any Personal Data, on behalf of the SCBF is conducted appropriately and in compliance with relevant legislation. This includes ensuring that individuals can exercise their rights in respect of their data and where data is shared with third parties, that there is adequate contractual obligation in place to protect shared individual’s Personal Data.

8.5 Employees of the SCBF are responsible for ensuring any processing of Personal Data in the course of their duties is conducted in accordance with the General Data Protection Regulation and other applicable legislation.

**9. Individual Rights**

9.1 The SCBF respects the rights of individuals in respect to their own data. Anyone wishing to access, erase, correct or limit the use of their information should contact the Data Protection Coordinator at data@scbf.org.uk

9.2 Anyone wishing to raise concerns about the use of their Personal Data or to report a data breach should contact the Data Protection Coordinator or, if unhappy with the response, the Information Commissioner’s Office.

**10. Additional Information**

10.1 Additional information on how the SCBF uses Personal Data can be found on our website <https://www.scbf.org.uk/> or in the Staff Privacy Notice.

Last updated: 18/1/2021;