



Processing Data

Neroche Woodlanders Limited will apply the following data protection principles when processing all personal data:

- (a) When obtaining personal data Neroche Woodlanders Limited will
 - have legitimate grounds for collecting and using it.
 - be transparent about the purpose for which it is collected and who it will or may be shared with by providing privacy notices when collecting it.
 - ensure we have consent from the individual.
 - ensure that the source is clear.
- (b) When retaining personal data Neroche Woodlanders Limited will
 - only hold and retain data sufficient for the intended purpose.
 - take reasonable steps to ensure accuracy as to facts and consider any challenges to this (personal data is not 'inaccurate' if it faithfully represents someone's opinion. In these circumstances, if challenged, the data would not have to be 'corrected'; but a note added to it recording that the data subject disagrees).
 - update, edit and revise data regularly in accordance with the purpose it was collected. E.g. changes to names, addresses, contact details, medical needs etc.
 - review how long data should be retained in accordance with the purpose it was collected.
 - give individuals access to their personal data if requested.
 - not use personal data in ways which have an unjustifiable adverse effect on the individual
 - not transfer personal data to a country or territory outside the European Economic Area (EEA) unless first ensuring that country or territory also ensures a like level of protection for the processing of personal data.
- (c) When storing personal data Neroche Woodlanders Limited will
 - ensure secure system policies of storage, including encryption where necessary, and access in order to prevent accidental loss, alteration or breaches of security.
 - be clear about who is responsible for ensuring information security.
 - swiftly and effectively respond to any breach of security including reporting this to the ICO and implementing a response plan.
- (d) When sharing personal data Neroche Woodlanders Limited will
 - ensure personal data is processed fairly, handled for the intended purpose and only in ways that an individual would reasonably expect. The data controller will not share personal data without legitimate reason.
 - Email communication - Email once sent, can easily be shared beyond control. The contents of email communications will be reviewed carefully to ensure that if they contain personal data, especially of a confidential or sensitive nature, they are sent with caution and only to those who will safeguard that personal data by marking the

email clearly as 'Strictly Confidential' or 'Sensitive' or 'Intended for recipient/s only and not to be shared' etc.

(e) When deleting, destroying or archiving personal data Neroche Woodlanders Limited will

- Delete or destroy data, when no longer required, securely.
- Archive data securely, only where retention is justified.

(f) Special rules for processing 'sensitive personal data'.

- All the above is applicable to sensitive personal data but additionally, sensitive personal data will only be held with the explicit consent of the data subject i.e. by obtaining consent in writing, requiring the individual to e.g. tick a box or sign a declaration etc. agreeing that their sensitive personal data may be processed.

(g) When we use cloud technology to support our business we will

- check that this is compliant for GDPR and is secure by verifying with each supplier.
- We update this practice every year.
- We use Google Docs and Dropbox to support our business and have checked that it is compliant for GDPR

<https://cloud.google.com/security/gdpr/>

(h) Staff and volunteers use their own devices to access and store data electronically/in the cloud. We will ask all staff to ensure their device is password protected and automatically locks.

Dealing with a Subject Access Request (SAR)

Following a request, a data subject will be given a copy of all personal data being held or being processed about them. The data subject will be charged a £10 fee to cover the administrative costs of providing a SAR.

We will comply with the SAR within 40 calendar days of receiving the payment and will respond appropriately to any subsequent request from the data subject to

- rectify, erase or destroy inaccurate data.
- stop processing the data if it is unnecessary or causing unjustified damage or distress to the data subject.
- ascertain if Neroche Woodlanders has contravened the Data Protection Act 1998, seeking further professional or legal advice as necessary.

Privacy Notice for Customers

GDPR and Neroche Woodlanders

The EU's General Data Protection Regulation is now in force. This will significantly strengthen individuals' rights to demand companies reveal or delete the personal data they hold. We are letting you know what we use your data for, and telling you can have it removed from our system, if you choose.

Please read the following.

- Your details will go on our mailing list if you ask to be included, or as a result of volunteering, or coming on a course, or attending an activity in the woods or talking to us at an event.
- We use your details only to communicate with you about Neroche Woodlanders activities. We never share the names, email addresses or other details of people on our database with third parties.
- We send our emails to you using Mailchimp, which provides you with an easy means to unsubscribe if you wish to do so – simply look for the 'Unsubscribe' button at the bottom of this and future emails and follow the links.
- We automatically delete all contact information as soon as someone removes themselves from our mailing list.
- We only hold information on current subscribers and we ensure this information is confidential and secure.
- You have the right to ask us about what data we hold. If you have any other concerns, please contact us.
- Information held on our BookWhen system is automatically deleted after 2 years of a customer becoming "inactive" A customer is classed as 'inactive' and will be included in the auto-deletion process if they have not made a booking or attended an event within the 2 year period.