

# Data Protection Policy

Guys Cliffe Walled Garden Trust Ltd (GCWGTL), as the Data Controller, is committed to protecting the rights and privacy of visitors, volunteers and any other person who can be easily identified by the data it holds, in accordance with Article 30(1) of the GDPR.



Other organisations and individuals working with GCWGTL – our Data Processors - and who have access to personal information, will also be expected to have read and comply with our Data Protection Policy, any other implications under GDPR; and will be required to process information in accordance with Article 30(2) of the GDPR.

## What we do with your Information

GCWGTL collects and holds personal data provided by individuals to enable it to perform its objectives as defined in its Memorandum and Articles of Association, and for the following purposes:

- Achieving GCWGTL's objectives
- Staff, Trustee and Volunteer Administration
- Keeping Accounts & Records
- The provision of Education services
- The provision of Private tours (our booking form will serve as contract)
- Communication with volunteers, trustees, visitors and other individuals contacting or supporting GCWGTL
- To meet our legal, regulatory and statutory obligations
- Advertising, Marketing & Public Relations – where you have given specific consent for us to do so.

## Who can use your Information apart from GCWGTL

Data will only be shared with other parties if they are engaged in delivering the purposes detailed above or where you have given us specific consent to do so. You have the right to object to us sharing your information, but, in some cases, this may result in GCWGTL not being able to provide a service you have requested. If this is the case – we will explain this to you.

## Processing your Data

- GCWGTL will only process data in accordance with its stated / documented purposes and in accordance with the requirements of the GDPR.
- Your information will only be transferred outside the European Economic Area to process our group emails and newsletters. Mailchimp – as our Data Processor – is required to comply with the terms of the GDPR. GCWGTL takes particular care to be aware of this when publishing information on the Internet, which can be accessed from anywhere in the globe.
- GCWGTL will keep an accurate record of your data; so that it can process your data accurately; however if any of your personal information changes – you will need to tell GCWGTL.

## Sensitive Data

Any sensitive data required to facilitate a service such as a private tour or an educational event, or to enable a volunteer to participate in activities in the Garden, and where provided by you or made manifestly public by you, will only be used to administer your needs and requests, or to protect your vital interests. It will be held and processed

strictly in accordance with Data Protection law. If any of the sensitive data provided by you changes, you should notify GCWGTL immediately.

### **Data Retention**

GCWGTL will retain your personal information for as long as is necessary for it (i) to fulfil the operational purposes detailed above, (ii) to comply with any applicable statutory, regulatory and other legal.

### **Data security**

We will take appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of data.

This includes the use of virus protection software and regularly changed password protection on our Volunteer and Contact databases, limiting access to personal information to only those who need to know, storage of manual records in lockable cabinets, anonymised group mailings, secure data disposal processes, risk assessments where personal data is involved and non-disclosure to 3<sup>rd</sup> parties unless consent has been maintained.

We will review our how we secure data regularly.

### **Your rights**

- You can apply to GCWGTL for a copy of any personal data we hold about you. This can be done by sending an email to [trustees@guyscliffewalledgarden.org.uk](mailto:trustees@guyscliffewalledgarden.org.uk) or sending a written request to Compliance Manager, Guy's Cliffe Walled Garden Trust Ltd., Coventry Road, Guy's Cliffe, Warwick, CV34 6FJ. You can stipulate what data you would like and how you would like it sent to you.
- You may withdraw your consent to the use of your data for any given purpose by emailing [trustees@guyscliffewalledgarden.org.uk](mailto:trustees@guyscliffewalledgarden.org.uk) or sending a written request to Compliance Manager, Guy's Cliffe Walled Garden Trust Ltd., Coventry Road, Guy's Cliffe, Warwick, CV34 6FJ. This may affect our ability to provide certain services to you; if so – we will explain this to you.
- The information held by GCWGTL should always be accurate. If it is not – you are entitled to ask that it be amended by emailing [trustees@guyscliffewalledgarden.org.uk](mailto:trustees@guyscliffewalledgarden.org.uk) or sending a written request to Compliance Manager, Guy's Cliffe Walled Garden Trust Ltd, Coventry Road, Guy's Cliffe, Warwick, CV34 6FJ
- You can ask to have your data deleted unless it is required for us to meet our statutory, regulatory or other legal obligations. If you would like to ask us to do this, you can so by emailing [trustees@guyscliffewalledgarden.org.uk](mailto:trustees@guyscliffewalledgarden.org.uk) or sending a written request to Compliance Manager, Guy's Cliffe Walled Garden Trust Ltd, Coventry Road, Guy's Cliffe, Warwick, CV34 6FJ

### **What happens if we make a mistake?**

If GCWGTL or any of its agents, staff or volunteers accidentally disclose any personal data (for example, accidentally showing other email addresses in a bulk mailing), or use your data in a manner which is not compliant with our policy or with Data Protection legislation - they should report this to GCWGTL's Compliance Manager as soon as this is known.