

# Data Protection Policy

The British Pilgrimage Trust CIO



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## Definitions

<b>Charity</b>	means The British Pilgrimage Trust CIO, a registered Charitable Incorporated Organisation.
<b>GDPR</b>	means the General Data Protection Regulation.
<b>Responsible Person</b>	means the Administrator of the CIO, or if the position is vacant, the Vice Chair of Trustees - Dr Guy Hayward.
<b>Register of Systems</b>	means a register of all systems or contexts in which personal data is processed by the Charity.

### 1. Data protection principles

The British Pilgrimage Trust cares passionately about the rights and freedoms of the general public. As such, the Charity is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data

may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and

- f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.”

## **2. General provisions**

- a. This policy applies to all personal data processed by the Charity.
- b. The Responsible Person shall take responsibility for the Charity’s ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.
- d. The Charity shall register with the Information Commissioner’s Office as an organisation that processes personal data.

## **3. Lawful, fair and transparent processing**

- a. To ensure its processing of data is lawful, fair and transparent, the Charity shall maintain a Register of Systems.
- b. The Register of Systems shall be reviewed at least annually.
- c. Individuals have the right to access their personal data and any such requests made to the charity shall be dealt with in a timely manner.

## **4. Lawful purposes**

- a. All data processed by the charity must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests ([see ICO guidance for more information](#)).
- b. With full regard to these lawful bases, the Charity collects some personal information regarding those who use our services in order to better track the impact of our work. In order to communicate this impact effectively, the Charity may choose to share anonymised, aggregated personal data supplied to us via our website and Eventbrite with the following:
  - i. Funders and major donors.
  - ii. Academic researchers.
  - iii. Strategic partners who wish to support our charitable purposes.
  - iv. Press.
- c. The Charity will not share non-anonymised personal information, email addresses or other contact information in this way.
- d. The Charity shall note the appropriate lawful basis in the Register of Systems.
- e. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- f. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the Charity’s

systems.

## **5. Data minimisation**

- a. The Charity shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

## **6. Accuracy**

- a. The Charity shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

## **7. Archiving / removal**

- a. To ensure that personal data is kept for no longer than necessary, the Charity shall put in place an archiving policy for each area in which personal data is processed and review this process annually.
- b. The archiving policy shall consider what data should/must be retained, for how long, and why.

## **8. Security**

- a. The Charity shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c. When personal data is deleted this should be done safely such that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions shall be in place.

## **9. Cookies**

- a. Cookies are small files saved to the user's computer hard drive that track and store information about the user's interactions with and usage of the British Pilgrimage Trust website, and other websites.
- b. Cookies are created by Wordpress, our website content management system. These cookies are used to store anonymous information about you to improve your experience and recognise you when you return to our website and login.
- c. Cookies are also created by third party platforms, including Facebook, Google, and Mailchimp, to enable and integrate with these services, and improve your browsing experience. The privacy policies for these services are available here:
- d. [https://www.facebook.com/full\\_data\\_use\\_policy](https://www.facebook.com/full_data_use_policy)  
<https://policies.google.com/privacy>  
<https://mailchimp.com/legal/privacy/>
- e. If users wish to prevent the use of cookies by this website, they should take all necessary steps within their web browsers security settings to block all cookies set by this and any third party websites.

## **9. Breach**

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the Charity shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO ([more information on the ICO website](#)).

END OF POLICY