



## SGSS10 GDPR Privacy Policy

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**GDPR:** The Gurdwara may hold personal information about you to provide various services; we obtain all the information directly from you. We hold the information securely, for a maximum of 6 years or as per legal requirements. Further details regarding GDPR can be accessed on our website.

## Introduction

All information provided will be processed in compliance with the Data Protection Act 1998 and the General Data Protection Regulation (GDPR).

Hounslow SGSS Gurdwara will not disclose any information you provide unless required to do so in accordance with 'access to information regimes' (these are primarily the Freedom of Information Act 2000, the Data Protection Act 1998 and the Environmental Information Regulations 2004).

## Who we are

This policy explains how we use the personal information we collect from you when you either visit the charity website, make contact via email/phone or participate in any project connected with the Gurdwara. By visiting the website(s) you are consenting to our use of your information in this way. We may make changes to this policy so please check from time to time for any updates.

The Gurdwara is the data controller for the personal data processed.

This data protection policy is intended to help meet that legal requirement. It should be noted, from the outset, that data protection should always take second place to safeguarding and child protection. If there is a potential conflict between the 2 competing requirements, the welfare of the child is paramount.

In the event of queries, please contact [khalsa@sgss.org](mailto:khalsa@sgss.org).

## Your personal data – what is it?

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession. The processing of personal data is governed by the General Data Protection Regulation (the "GDPR").

## The Information that we may hold

- Names, Address, Contact number(s), Email addresses.

Other additional information captured may include

- Bank details and other financial information, e.g. participants in any program/project activities.
- Past, present and participants' academic, disciplinary, offences, religious, and certain medical conditions needed to carry out grant-funded and other programs including information about any special needs.
- Where appropriate, info about individuals' health, and contact details for next of kin.
- References and other referrals given or received by the charity about participants in any grant-funded or other program, and information provided by previous establishments and/or other professionals or organisations working with participants as well as references supplied by previous employers of staff.
- Academic and professional qualifications as well as relevant previous experience and annual reviews of employees.
- Images of participants (and occasionally other individuals) engaging in the charity grant-funded and other programs and activities;

## You may provide your information by

- Filling in forms on our website, online, and in hard copy
- Subscribing to our publications, newsletters and updates about our activities and events
- Registering for or enquiring about our activities, events and services
- Being referred to us through partners, grant funders and other organisations in relation to our programs and activities
- Contacting us through our websites/reporting problems with our websites.

### The nature of your personal data we may use

The categories of your personal data that we will be using are:

- Registering your child to our supplementary service
- Your child's details, age, name, health history, address
- Your contact details, name, address history,
- Personal sensitive information, e.g. diversity declarations
- Your employment/volunteering history, appraisal notes

### Why our use of your personal data is lawful

In order for our use of your personal data to be lawful, we need to meet one (or more) conditions in the data protection legislation. For the purpose of this work, the relevant condition that we are meeting is:

- Explicit consent of the data subject so that we can keep you informed about news, events, activities and services and keep you informed about diocesan events.
- Processing is necessary for carrying out legal obligations in relation to Gift Aid or under employment, social security or social protection law, or a collective agreement;

### How long we will keep your personal data

The data will be securely deleted after 6 years, or when requested by a relevant individual.

### Reasons we can collect and use your personal information

- To support learning
- To monitor progress
- To provide pastoral care
- To be able to make health care, employment and other referrals
- To comply with the law
- To safeguard staff, program participants and volunteers

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another legitimate interest or reason and that reason is compatible with the original purpose.

### Legitimate Interests

As mentioned, we can sometimes use your personal information where this is necessary for our legitimate interests (or those of a third party). This includes where the use of your personal information is necessary to:

- ensure effective administration and management of your employment or engagement, benefits, management of any grant-funded programs, and business continuity;
- ensure our assets are protected, kept confidential, and not used for inappropriate or unlawful purposes;
- Ensure child safety, maintain safeguarding procedures, and link up to other support services.
- Ensure we can contact you or your family in the case of an emergency; family follow-up
- Check you are legally entitled to work, manage performance, discipline, and promotion processes;
- Manage training and development requirements;
- Deal with disputes and accidents and take legal or other professional advice;
- Comply with another country's laws and regulations;
- Prevent fraud, any dangerous crimes, financial crimes; and any other crimes that will bring the organisation to disrepute.
- Ensure network and information security.

If you would like further information on our legitimate interests as applied to your personal information, please contact The Data Protection Officer (General Secretary [khalsa@sgss.org](mailto:khalsa@sgss.org)).

If there is processing or sharing that relies on your consent, we will make this clear to you and ensure we seek your consent.

#### Who do we share your personal information with

- Teams and organisations working to improve outcomes for children and young people
- Commissioned providers of local authority and government departments/agencies services,
- Commissioned work funders and organisations,
- Support organisations providing capacity development support, prevent related organisations and staff
- Local police services ensure the safety for program participants, staff and volunteers
- Charity Commission, local LADO team, safeguarding practitioners
- Local multi-agency forums which provide advice, support and guidance (such as Local Inclusion Forum Team (LIFT))

We will share personal information with law enforcement or other authorities if required by applicable law.

#### Your data protection rights

You have the right:

- To ask us for access to information about you that we hold;
- To have your personal data rectified, if it is inaccurate or incomplete;
- To request the deletion or removal of personal data where there is no compelling reason for its continued processing;
- To restrict our processing of your personal data (i.e. permitting its storage but no further processing);
- To object to direct marketing (including profiling) and processing for the purposes of scientific/historical research and statistics; and
- Not to be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you.

If you need to contact us regarding any of the above, please do so via email at: [khalsa@sgss.org](mailto:khalsa@sgss.org).

#### Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality. In addition, our data is backed up in alternative fixed-location devices, no mobile devices are used for data storage.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

#### Withdrawal of consent and the right to lodge a complaint

Where we are processing your personal data with your consent, you have the right to withdraw that consent. If you change your mind, or you are unhappy with our use of your personal data, please contact [khalsa@sgss.org](mailto:khalsa@sgss.org).

#### Contact Information

If you have any questions about how your personal information will be processed, please contact the General Secretary via [khalsa@sgss.org](mailto:khalsa@sgss.org).