



## 1. Purpose

Spread Some Sunshine Charity is committed to protecting personal data and respecting the privacy of individuals. This policy explains how the charity collects, uses, stores, and protects personal data in line with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

## 2. Scope

This policy applies to:

- Trustees
- Staff
- Volunteers
- Contractors and third parties acting on behalf of the charity

It covers all personal data held by the charity, whether in electronic or paper form.

## 3. Definitions

**Personal Data:** Any information that identifies a living individual, such as names, contact details, or donation records.

**Special Category Data:** More sensitive personal data, such as health information or data relating to children, which requires additional protection.

## 4. Data Protection Principles

The charity will process personal data in accordance with the UK GDPR principles. Personal data will be:

- Processed lawfully, fairly, and transparently
- Collected for specified, explicit, and legitimate purposes
- Adequate, relevant, and limited to what is necessary
- Accurate and kept up to date
- Kept no longer than necessary
- Processed securely to prevent unauthorised access, loss, or damage

## 5. Lawful Basis for Processing

Spread Some Sunshine Charity will only process personal data where there is a lawful basis, including:

- Consent
- Legal obligation
- Contract
- Legitimate interests (where appropriate and balanced with individual rights)

The lawful basis used will be identified and documented.

## 6. Types of Data Collected

The charity may collect and process:

- Names and contact details of supporters, donors, volunteers, and beneficiaries
- Donation and Gift Aid records
- Communication preferences
- Images or stories (with consent)
- Safeguarding or incident records (where necessary)

## 7. How Data Is Used

Personal data will be used only to:

- Deliver the charity's activities and services
- Communicate with supporters and volunteers
- Process donations and fundraising activities
- Meet legal and regulatory obligations

## 8. Data Sharing

- Personal data will not be shared with third parties unless there is a lawful reason to do so.
- Where third parties process data on the charity's behalf, appropriate agreements will be in place.
- Data will never be sold or shared for marketing purposes.

## 9. Data Security

The charity will take appropriate technical and organisational measures to protect personal data, including:

- Password-protected systems and devices
- Restricted access to personal data
- Secure storage of paper records
- Regular review of data handling practices

## 10. Data Retention

- Personal data will be kept only as long as necessary for the purpose for which it was collected.
- A data retention schedule will be followed where appropriate.
- Data will be securely deleted or destroyed when no longer required.

## 11. Individual Rights

Individuals have rights under data protection law, including:

- The right to access their personal data
- The right to request correction of inaccurate data
- The right to request erasure (where applicable)
- The right to object to or restrict processing
- The right to withdraw consent at any time

Requests will be responded to within statutory time limits.

## 12. Data Breaches

- Any actual or suspected data breach must be reported immediately to the trustees.
- The charity will investigate and take appropriate action.
- Where required, serious breaches will be reported to the Information Commissioner's Office (ICO).

## 13. Responsibilities

- Trustees are responsible for ensuring compliance with data protection law.
- All individuals handling personal data must follow this policy and report concerns promptly.

## 14. Training and Awareness

- Trustees, staff, and volunteers will be made aware of this policy.
- Data protection guidance will be provided where necessary.

## 15. Review

This policy will be reviewed regularly and updated as required to reflect changes in legislation or charity activities.

### Approval and Review

**Approved by:** Board of Trustees, Spread Some Sunshine Charity

**Date of Approval:** January 2026

**Policy Owner:** Board of Trustees

**Review Frequency:** Every 2 years (*or sooner if required*)

**Next Review Date:** January 2028