

# DATA PROTECTION POLICY

June 2022, Version 1.3

## 1. POLICY SCOPE

- 1.1. This Policy sets out the obligations of New Horizons Coventry (“the Charity” and “the data controller”), regarding data protection and the rights of Trustees, Employees and Volunteers, current and previous Members, visitors and contacts (“Data Subjects”) in respect of their personal data under UK General Data Protection Regulation (“GDPR”)¹.
- 1.2. In this policy any reference to “Members” are those individuals who have indicated:
  - their commitment to the mission and values of The Charity; and
  - the intention of regularly attendance at Services or Meetings, in person or via electronic means.The Charity would expect Trustees, Employees and Volunteers to also be Members.
- 1.3. The GDPR defines “personal data” as any information relating to an identified or identifiable natural person (a “Data Subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, religious, or social identity of that natural person.
- 1.4. This Policy sets the Charity’s obligations regarding the collection, processing, transfer, storage, and disposal of personal data. The procedures and principles set out in this document must be followed at all times by the Charity, its Trustees, Employees, Volunteers and/or third parties working on behalf of the Charity.
- 1.5. The Charity is committed not only to the letter of the law, but also to the spirit of the law and places high importance on the correct, lawful, and fair handling of all personal data, respecting the legal rights, privacy, and trust of all individuals with whom it deals.

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¹ From 1st January 2021, the law relating to data processing in the UK changed. Any processing of data prior to 1st January 2021 has been undertaken in accordance with EU General Data Protection Regulation (EU) 2016/679 (“the EU GDPR”). From 1st January 2021, the EU GDPR no longer applies to the UK. The UK has retained the EU GDPR under Section 3 of the European Union (Withdrawal) Act 2018 (EUWA). It has been renamed as the UK GDPR and tailored by the Data Protection Act 2018. From 1st January 2021, the UK data protection regime consists of the UK GDPR as incorporated under the EUWA and amended by the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019 (DPPEC) and the Data protection Act 2018 as enacted in May 2018 and amended by the DPPEC Regulations. 2 Article 4 of the UK GDPR.

# DATA PROTECTION POLICY

June 2022, Version 1.3

## 2. DATA PROTECTION PRINCIPLES

- 2.1. This Policy aims to ensure compliance with the GDPR. The GDPR sets out the following principles with which any party handling personal data must comply. All personal data must be:
- Processed lawfully, fairly, and in a transparent manner in relation to the Data Subject.
  - 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.
  - Adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed.
  - Accurate and, where necessary, kept up to date. Every reasonable step must be taken to ensure that personal data that is inaccurate, having regard to the purposes for which it is processed, is erased, or rectified without delay.
  - Kept in a form which permits identification of Data Subjects for no longer than is necessary for the purposes for which the personal data is 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 the Data Subject.
  - 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.

## 3. THE RIGHTS OF DATA SUBJECTS

- 3.1. The GDPR sets out the following rights applicable to Data Subjects (please refer to the parts of this Policy indicated for further details):
- The right to be informed (See **Privacy Notice**).
  - The right of access (Section 13);
  - The right to rectification (Section 144);
  - The right to erasure (also known as the 'right to be forgotten') (Section 15);
  - The right to restrict processing (Section 16);
  - The right to data portability (Section 17);
  - The right to object (Section 18); and
  - Rights with respect to automated decision-making and profiling (not applicable to the operations of the Charity).

# DATA PROTECTION POLICY

June 2022, Version 1.3

## 4. LAWFUL, FAIR AND TRANSPARENT DATA PROCESSING

4.1. The GDPR seeks to ensure that personal data is processed lawfully, fairly, and transparently, without adversely affecting the rights of the Data Subject. The GDPR states that processing of personal data shall be lawful if at least one of the following applies:

- The Data Subject has given consent to the processing of their personal data for one or more specific purposes;
- The processing is necessary for the performance of a contract to which the Data Subject is a party, or in order to take steps at the request of the Data Subject prior to entering into a contract with them;
- The processing is necessary for compliance with a legal obligation to which the data controller is subject;
- The processing is necessary to protect the vital interests of the Data Subject or of another natural person;
- The processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller; or
- The processing is necessary for the purposes of the legitimate interests pursued by the data controller or by a third party, except where such interests are overridden by the fundamental rights and freedoms of the Data Subject which require protection of personal data, in particular where the Data Subject is a child.

4.2. Personal data held by the Charity is also always classified as “special category data” (also known as “sensitive personal data”) as affiliation with the Charity identifies an individual’s religion. Processing of sensitive personal data must meet at least one of the following conditions:

- The Data Subject has given their explicit consent to the processing of such data for one or more specified purposes;
- The processing is necessary for the purpose of carrying out the obligations and exercising specific rights of the data controller or of the Data Subject in the field of employment, social security, and social protection law (insofar as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law which provides for appropriate safeguards for the fundamental rights and interests of the Data Subject);
- The processing is necessary to protect the vital interests of the Data Subject or of another natural person where the Data Subject is physically or legally incapable of giving consent;
- The Data Controller is a foundation, association, or other non-profit body with a political, philosophical, religious, or trade union aim, and the processing is carried out in the course of its legitimate activities, provided that the processing relates solely to the Members or former Members of that body or to persons who have regular contact with it in connection with its purposes and that the personal data is not disclosed outside the body without the consent of the Data Subjects;

# DATA PROTECTION POLICY

June 2022, Version 1.3

- The processing relates to personal data which is clearly made public by the Data Subject;
- The processing is necessary for the conduct of legal claims or whenever courts are acting in their judicial capacity;
- The processing is necessary for substantial public interest reasons, on the basis of Union or Member State law which shall be proportionate to the aim pursued, shall respect the essence of the right to data protection, and shall provide for suitable and specific measures to safeguard the fundamental rights and interests of the Data Subject;
- The processing is necessary for the purposes of preventative or occupational medicine, for the assessment of the working capacity of an employee, for medical diagnosis, for the provision of health or social care or treatment, or the management of health or social care systems or services on the basis of Union or EU Member State law or pursuant to a contract with a health professional, subject to the conditions and safeguards referred to in Article 9(3) of the GDPR; or
- The processing is necessary for public interest reasons in the area of public health, for example, protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of Union or Member State law which provides for suitable and specific measures to safeguard the rights and freedoms of the Data Subject (in particular, professional secrecy).

## 5. SPECIFIED, EXPLICIT, AND LEGITIMATE PURPOSES

- 5.1. The Charity collects and processes the personal data set out in Appendix A of this Policy. This includes personal data collected directly from Data Subjects only and not obtained from third parties.
- 5.2. The Charity only collects, processes, and holds personal data for the specific purposes set out in Appendix A of this Policy (or for other purposes expressly permitted by the GDPR).
- 5.3. Data Subjects are kept informed at all times of the purpose or purposes for which the Charity uses their personal data. Please refer to the Privacy Notice and Appendix A for more information.

## 6. ADEQUATE, RELEVANT, AND LIMITED DATA PROCESSING

- 6.1. The Charity will only collect and process personal data for and to the extent necessary for the specific purpose or purposes of which Data Subjects have been informed (or will be informed) as under Section 5, above, and as set out in Appendix A.

# DATA PROTECTION POLICY

June 2022, Version 1.3

## 7. COMPLIANCE WITH THE CHILDREN'S CODE

- 7.1. In compliance with the ICO Age Appropriate Design statutory code of practice<sup>2</sup> for online services, the Charity limits the collection of children's personal data to that which is required for its legitimate purposes e.g. to administer age-related groups and activities or to ensure awareness of relevant health and dietary requirements.
- 7.2. In line with this Policy, the Charity collects personal data relating to all Members. Children age 13 to 18 provide consent on their own behalf for the use of their personal data. Children age 13 to 18 may be provided with a username and password to access online platforms and email accounts used by the Charity (e.g. WorkPlace & nhkc.uk email accounts).
- 7.3. The parents of children age 11 and 12 may be provided with a username and password to facilitate access for their children to online platforms and email accounts. Parents will provide consent on behalf of their children and remain the owner of the username and password until their child reaches 13 years old and is able to provide consent on their own behalf. Children under the age of 11 years old will not be facilitated to access any online platforms or email accounts administered by the Charity.
- 7.4. The Charity considers the best interests of children in the delivery of online platforms, minimises data collected from and on behalf of children and explains the use of personal data in an accessible and age-appropriate manner to children.

## 8. ACCURACY OF DATA AND KEEPING DATA UP TO DATE

- 8.1. The Charity shall ensure that all personal data collected, processed, and held by it is kept accurate and up to date. This includes, but is not limited to, the rectification of personal data at the request of a Data Subject, as set out in Section 14, below.
- 8.2. The accuracy of personal data shall be checked when it is collected and at regular intervals thereafter. If any personal data is found to be inaccurate or out-of-date, all reasonable steps will be taken without delay to amend or erase that data, as appropriate.

## 9. DATA RETENTION

- 9.1. The Charity shall not keep personal data for any longer than is necessary in light of the purpose or purposes for which that personal data was originally collected, held, and processed.

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<sup>2</sup> See further information on the ICO website: <https://ico.org.uk/for-organisations/childrens-code-hub/>

# DATA PROTECTION POLICY

June 2022, Version 1.3

- 9.2. When personal data is no longer required, all reasonable steps will be taken to erase or otherwise dispose of it without delay.
- 9.3. Full details of the Charity's data retention periods for specific personal data types held by the Charity are set out in the Data Retention Schedule - Appendix A.
- 9.4. At least every 18 months, a review will be carried out in which all personal data held by the Charity is considered against the Data Retention Schedule and any data no longer required is erased and disposed of in line with Section 21 of this Policy.

## 10. SECURE PROCESSING

- 10.1. The Charity shall ensure that all personal data collected, held, and processed is kept secure and protected against unauthorised or unlawful processing and against accidental loss, destruction, or damage. Further details of the technical and organisational measures which shall be taken are provided in Sections 20 to 25 of this Policy.

## 11. ACCOUNTABILITY AND RECORD-KEEPING

- 11.1. The Charity's Data Protection Lead may be contacted at [compliance@nhkc.uk](mailto:compliance@nhkc.uk).
- 11.2. The Data Protection Lead shall be responsible for overseeing the implementation of this Policy and for monitoring compliance with this Policy, the Charity's other data protection-related policies, and with the GDPR and other applicable data protection legislation.
- 11.3. The Charity shall keep written internal records of all personal data collection, holding, and processing, which shall incorporate the following information:
  - The name and details of the Charity, its Data Protection Lead, and any applicable third-party data processors;
  - The purposes for which the Charity collects, holds, and processes personal data;
  - Details of the categories of personal data collected, held, and processed by the Charity, and the categories of Data to which that personal data relates;
  - Details of how long personal data will be retained by the Charity (please refer to the Data Retention Schedule - Appendix A); and
  - Descriptions of all technical and organisational measures taken by the Charity to ensure the security of personal data.

# DATA PROTECTION POLICY

June 2022, Version 1.3

## 12. DATA PROTECTION IMPACT ASSESSMENTS

- 12.1. The Charity is aware of Data Protection Impact Assessments for any new uses of personal data. These will be carried out when considered necessary to ensure compliance with GDPR requirements.
- 12.2. The Charity recognises that under the requirements of the Children's Code a Data Protection Impact Assessment is necessary to take into account the best interests of children in the way in which the Charity utilises their data.

## 13. DATA SUBJECT ACCESS

- 13.1. Data Subjects may make subject access requests ("SARs") at any time to find out more about the personal data which the Charity holds about them, what it is doing with that personal data, and why.
- 13.2. Individuals wishing to make a SAR should preferably do so by sending an email to the Charity's Data Protection Lead at [compliance@nhkc.uk](mailto:compliance@nhkc.uk).
- 13.3. Responses to SARs shall normally be made within one month of receipt, however this may be extended by up to two months if the SAR is complex and/or numerous requests are made. If such additional time is required, the Data Subject shall be informed.
- 13.4. All SARs received shall be handled by the Charity's Data Protection Lead.
- 13.5. The Charity does not charge a fee for the handling of normal SARs. The Charity reserves the right to charge reasonable fees for additional copies of information that has already been supplied to a Data Subject, and for requests that are manifestly unfounded or excessive, particularly where such requests are repetitive.

## 14. RECTIFICATION OF PERSONAL DATA

- 14.1. Data Subjects have the right to require the Charity to rectify any of their personal data that is inaccurate or incomplete.
- 14.2. The Charity shall rectify the personal data in question, and inform the Data Subject of that rectification, within one month of the Data Subject informing the Charity of the issue. The period can be extended by up to two months in the case of complex requests. If such additional time is required, the Data Subject shall be informed.

# DATA PROTECTION POLICY

June 2022, Version 1.3

14.3. In the event that any affected personal data has been disclosed to third parties, those parties shall be informed of any rectification that must be made to that personal data.

## 15. ERASURE OF PERSONAL DATA

15.1. Data Subjects have the right to request that the Charity erases the personal data it holds about them in the following circumstances:

- It is no longer necessary for the Charity to hold that personal data with respect to the purpose(s) for which it was originally collected or processed.
- The Data Subject wishes to withdraw their consent to the Charity holding and processing their personal data.
- The Data Subject objects to the Charity holding and processing their personal data (and there is no overriding legitimate interest to allow the Charity to continue doing so) (see Section 18 of this Policy for further details concerning the right to object).
- The personal data has been processed unlawfully.
- The personal data needs to be erased in order for the Charity to comply with a legal obligation.

15.2. Unless the Charity has reasonable grounds to refuse to erase personal data, all requests for erasure shall be complied with, and the Data Subject informed of the erasure, within one month of receipt of the Data Subject's request. The period can be extended by up to two months in the case of complex requests. If such additional time is required, the Data Subject shall be informed.

15.3. In the event that any personal data that is to be erased in response to a Data Subject's request has been disclosed to third parties, those parties shall be informed of the erasure (unless it is impossible or would require disproportionate effort to do so).

## 16. RESTRICTION OF PERSONAL DATA PROCESSING

16.1. Data Subjects may request that the Charity ceases processing the personal data it holds about them. If a Data Subject makes such a request, the Charity shall retain only the amount of personal data concerning that Data Subject (if any) that is necessary to ensure that the personal data in question is not processed further.

16.2. In the event that any affected personal data has been disclosed to third parties, those parties shall be informed of the applicable restrictions on processing it (unless it is impossible or would require disproportionate effort to do so).



# DATA PROTECTION POLICY

June 2022, Version 1.3

## 17. DATA PORTABILITY

17.1. The Charity, its operations and the nature of the personal data which it processes would not generally result in requests for data portability by Data Subjects.

## 18. OBJECTIONS TO PERSONAL DATA PROCESSING

18.1. Data Subjects have the right to object to the Charity processing their personal data based on legitimate interests and direct marketing (fundraising requests).

18.2. Where a Data Subject objects to the Charity processing their personal data based on its legitimate interests, the Charity shall cease such processing immediately, unless it can be demonstrated that the Charity's legitimate grounds for such processing override the Data Subject's interests, rights, and freedoms, or that the processing is necessary for the conduct of legal claims.

18.3. Where a Data Subject objects to the Charity processing their personal data for direct marketing (fundraising) purposes, the Charity shall not send them direct fundraising emails.

## 19. PERSONAL DATA COLLECTED, HELD, AND PROCESSED & DATA OWNERS

19.1. The personal data that is collected, held, and processed by the Charity, together with details of the retention policy for that data, can be found in Appendix A.

### 19.2. Image Capture

The Charity will capture and store photo and video format Personally Identifiable Images at meetings and events run by and on behalf of the Charity via designated Image Capture Teams using devices owned by or commission on behalf of the Charity. Images are used for the purposes that consent has been given and are stored, retained and disposed of in accordance with this policy.

## 20. DATA SECURITY - STORAGE

20.1. The Charity has a Data Storage Schedule which set out the authorised storage locations, security measures and mechanisms for sharing personal data.

# DATA PROTECTION POLICY

June 2022, Version 1.3

20.2. Trustees, Employees, Volunteers and third parties working on behalf of the Charity are responsible for ensuring data is collected, stored and handled appropriately and that it is processed in line with this Policy.

20.3. The Head of GCT has specific data storage responsibilities for:

- Ensuring all systems, services and equipment used for storing data meet acceptable security standards;
- Performing regular checks and scans to ensure security hardware and software is functioning properly; and
- Evaluating any third-party services the company is considering using to store or process data. For instance, cloud computing services.

20.4. Personal data is stored in compliance with the following measures:

- Where personal data is stored on paper, it shall be kept securely and only accessible to those that need to access it.
- Where personal data is stored electronically, it must be protected from unauthorised access and accidental deletion.
- If data is stored on removable media, these shall be kept locked away securely when not in use.
- Data shall be encrypted where possible and appropriate to do so.
- Where possible, data is only stored on designated drives and servers, and only uploaded to approved cloud computing services.
- Data shall be backed up frequently, and regular backup tests conducted.
- All servers and computers containing data shall be protected by approved security software and a firewall.

## 21. DATA DISPOSAL

21.1. When any personal data is to be erased or otherwise disposed of for any reason (including where copies have been made and are no longer needed), it should be securely deleted and disposed of:

- Personal information held in physical media will be shredded.
- Personal information held in electronic form will be:
  - Deleted from storage locations including backups.
  - Anonymised in an appropriate manner that removes any link to the personal information of a Data Subject.

# DATA PROTECTION POLICY

June 2022, Version 1.3

## 22. DATA SECURITY - USE OF PERSONAL DATA

- 22.1. No personal data may be shared informally and if an employee/volunteer or third party working on behalf of the Charity requires access to any personal data that they do not already have access to, such access should be formally requested from the relevant Department Lead.
- 22.2. Personal data must be handled with care at all times and should not be left unattended or on view to unauthorised employees/volunteers or third parties at any time.
- 22.3. If personal data is being viewed on a computer screen and the computer in question is to be left unattended for any period of time, the user must lock the computer and screen before leaving it.

## 23. DATA SECURITY - IT SECURITY

- 23.1. Trustees, Employees and Volunteers are encouraged to change all passwords regularly and not to use words or phrases that can be easily guessed or otherwise compromised. Passwords should contain a combination of uppercase and lowercase letters, numbers, and symbols.
- 23.2. Where Trustees, Employees and Volunteers are identified as being responsible for handling or storing particularly high risk or sensitive personal data, they will be given access to Password Manager software in order to securely generate and store unique, strong passwords.
- 23.3. Trustees, Employees and Volunteers are encouraged not to write down any passwords or shared between any employees/volunteers or third parties working on behalf of the Charity, irrespective of seniority or department. If a password is forgotten, it must be reset using the applicable method.

## 24. ORGANISATIONAL MEASURES

- 24.1. All Members including Trustees/Employees/Volunteers as well as third parties working on behalf of the Charity shall be made fully aware of both their individual responsibilities and the Charity's responsibilities under the GDPR and under this Policy, and shall be provided with a copy of this Policy.
- 24.2. Only Trustees/Employees/Volunteers or third parties working on behalf of the Charity that need access to, and use of, personal data in order to carry out their assigned duties correctly shall have access to personal data held by the Charity.
- 24.3. All Trustees/Employees/Volunteers or third parties working on behalf of the Charity handling personal data will be appropriately trained to do so.

# DATA PROTECTION POLICY

June 2022, Version 1.3

- 24.4. All Trustees/Employees/Volunteers or third parties working on behalf of the Charity handling personal data shall be required and encouraged to exercise care, caution, and discretion when discussing matters that relate to personal data.
- 24.5. Methods of collecting, holding, and processing personal data shall be regularly evaluated and reviewed.
- 24.6. All personal data held by the Charity shall be reviewed periodically.

## 25. TRANSFERRING PERSONAL DATA TO A COUNTRY OUTSIDE THE EEA

- 25.1. The Charity may from time-to-time transfer ('transfer' includes making available remotely) personal data to countries outside of the EEA. We obtain consent when we transfer personal data outside of the EEA to our trusted partners.

## 26. DATA BREACH NOTIFICATION

- 26.1. A data breach is a loss or unauthorised exposure of personal data. All personal data breaches must be reported immediately to the Charity's Data Protection Lead.
- 26.2. If a personal data breach occurs and that breach is likely to result in a risk to the rights and freedoms of Data Subjects (e.g. financial loss, breach of confidentiality, discrimination, reputational damage, or other significant social or economic damage), the Data Protection Lead must ensure that the Information Commissioner's Office (ICO) is informed of the breach without delay, and in any event, within 72 hours after having become aware of it.
- 26.3. In the event that a personal data breach is likely to result in a high risk (that is, a higher risk than that described under Part 26.2) to the rights and freedoms of Data Subjects, the Data Protection Lead must ensure that all affected Data Subjects are informed of the breach directly and without undue delay.

# DATA PROTECTION POLICY

June 2022, Version 1.3

26.4. Data breach notifications shall include the following information:

- The categories and approximate number of Data Subjects concerned;
- The categories and approximate number of personal data records concerned;
- The name and contact details of the Charity's Data Protection Lead (or other contact point where more information can be obtained);
- The likely consequences of the breach; and
- Details of the measures taken, or proposed to be taken, by the Charity to address the breach including, where appropriate, measures to mitigate its possible adverse effects.

<b>Approval Status</b>	Approved by Trustees 14 June 2022
<b>Last Approved</b>	21/06/2019
<b>Review Period</b>	Two years
<b>Next Review Date</b>	June 2024
<b>Key Department(s)</b>	Governance

# DATA PROTECTION POLICY

June 2022, Version 1.3

## APPENDIX A: SCHEDULE OF DATA HELD AND RETENTION PERIOD

Types of personal information	Description	Where data is held (not exhaustive list)	Data Owner	Data Retention Period
Contact	Your name and address	Financial records, including Gift Aid	Head of Finance	10 years
		DBS Records	Head of Safeguarding	10 years
		People Group records	People Group Lead	Until the data review after ceasing to be a Member
		Consent Spreadsheet	Head of Governance	10 years
		Employment records	Head of Finance	10 years
	Your contact details including email address/ telephone/ mobile number(s)	Consent Spreadsheet	Head of Governance	10 years
	Contact details for parents/ guardians of minors (under 18's)	Consent Spreadsheet	Head of Governance	10 years
People Group records		People Group Lead	Until the data review after ceasing to be a Member	
Personal characteristics	Date of Birth and/or Age	Consent Spreadsheet	Head of Governance	10 years
		People Group records	People Group Lead	Until the data review after ceasing to be a Member
	Marital status	People Group records	People Group Lead	Until the data review after ceasing to be a Member
	Gender	Consent Spreadsheet	Head of Governance	10 years
		People Group records	People Group Lead	Until the data review after ceasing to be a Member
	Your family members, who are also connected with NHC: Spouse, children/ parents/ guardians	Consent Spreadsheet	Head of Governance	10 years
		People Group records	People Group Lead	Until the data review after ceasing to be a member

# DATA PROTECTION POLICY

June 2022, Version 1.3

Types of personal information	Description	Where data is held (not exhaustive list)	Data Owner	Data Retention Period
Employment and Education	For employees or prospective employees, or where specific support is requested regarding employment or education circumstances, this includes details about your work or profession, education, qualifications and skills.	HR records	Head of Finance	10 years
		Communications including NHKC.UK emails	Individual(s) commissioned to provide support	Until the data review after ceasing to be a Member
Contractual	Details about the products or services we provide to you.	Financial records	Head of Finance	10 years
Financial	Your payment details where you require us to make payments to you	Financial records	Head of Finance	10 years
	Details of financial transactions with you so as to maintain our own accounts and records	Financial records	Head of Finance	10 years
	Details of donations you make to us and Gift Aid declarations	Financial records	Head of Finance	10 years
	Details of expenses you claim from us when conducting the Charity business	Financial records	Head of Finance	10 years
	Details of personal finances where you have shared the information in order to receive specific support	NHKC.UK emails	Individual(s) commissioned to provide support	Until the data review after ceasing to be a Member

# DATA PROTECTION POLICY

June 2022, Version 1.3

Types of personal information	Description	Where data is held (not exhaustive list)	Data Owner	Data Retention Period
Communications	What we learn about you from letters, emails, and conversations between us in relation to the activities of New Horizons.	Communications including NHKC.UK emails, WhatsApp messages	Individual(s) commissioned to provide support	Until the data review after ceasing to be a Member
Special types of data: The law and other regulations treat some types of personal information as special. By virtue of being a religious organisation, we will collect data about your religious beliefs. We will only collect and use these types of data if the law allows us to do so.	Religious or philosophical beliefs, by implication of being a church member	WorkPlace account	Head of GCT	Until the data review after ceasing to be a Member
		People Group records	People Group Lead	Until the data review after ceasing to be a Member
	Health data including gender, for recording which People Group you should be in	People Group records	People Group Lead	Until the data review after ceasing to be a Member
	Criminal convictions & offences, for Safeguarding purposes	DBS records	Chris Waddell	Until the data review after ceasing to be a Member
	Disability, for making reasonable adjustments	Employment records	Head of Finance	10 years
	Sexuality, for pastoral care	Communications, including NHKC.UK emails	PG Lead	Until the data review after ceasing to be a Member
Consents	Any permissions, consents, or preferences that you give us. This includes things like how you want us to contact you.	Consent spreadsheet	Head of Governance	10 years
Image	Your image may be captured by photograph or video recording at meetings or events held by the Charity.	GCT storage sites	Head of GCT	For an unlimited period, unless we receive an erasure request. We will treat any request in line with this policy UK GDPR