

## **British Friends of Vanuatu Data Protection and Privacy Policy**

*On 25 May 2018 new rules came into force relating to the collecting, storing and use by organisations of personal data about individuals, and providing for individuals whose data is held to know about what is kept, how it is used and to have certain rights to see it, correct it or remove permission for it to be held. Individuals must be told what data is held about them and on what basis, and no use must be made of that data other than as authorised and notified to the individual, who must actively approve of that basis of use.*

### **Who are we?**

The British Friends of Vanuatu (BFoV) is a members' organisation whose objectives are to relieve poverty and advance education in Vanuatu, and generally to promote interest in Vanuatu, maintain social contact with Vanuatu, keep members informed of events in Vanuatu and to keep members and organisations with an interest in Vanuatu in touch with each other, as set out more particularly in Clause 3 of the Constitution of BFoV dated 11 October 2008; and also for the purposes of administering The British Friends of Vanuatu Charitable Trust (BFoV-CT), which is a charity registered in UK number 1112258. BFoV-CT is run by trustees who are members of the management committee of BFoV and elected by the members of BFoV in General Meeting every two years.

### **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) 2018. Under the terms of the GDPR, BFoV is the data controller for personal data held to manage the membership records and operations of BFoV and BFoV-CT.

### **How do we process your personal data?**

BFoV complies with its obligations under the GDPR by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures and policies are in place to protect personal data.

### **What personal data do we use, and why?**

Personal data collected from members may consist of name; postal address; email address; telephone number(s); the number of persons per household and their identities; joining dates; bank account details (if given); and records (and the absence of records as the case may be) of subscriptions, donations and Gift Aid declarations; and details relating to a member's employment in, or connection with, Vanuatu. In the case of students and applicants for funding, information obtained may also include details of personal and family circumstances, age, academic status, academic achievements and personal references used to evaluate applications and continuing funding.

The uses that may be made of the data held by BFoV are:

- To record the fact of a member's membership, and to maintain membership records
- To contact members about the status of their membership

- To contact members about the activities of BFoV, including notices of general meetings, appeals for funding, announcements of activities, or to relay news about members or about Vanuatu
- To send members the newsletter Nabanga (by post or email as members choose)
- To publish in Nabanga news about or containing reference to members and their Vanuatu related activities
- To contact members in pursuance of the objects of BFoV as set out in the Constitution
- To enable BFoV to submit proper information as required by HMRC for Gift Aid purposes
- To facilitate the keeping of accurate accounting records and audit
- To disclose selected information to any person or body (e.g. The Charity Commission; HMRC; a Court of Law) having the right by law to require production of that information
- To maintain contact with applicants for student sponsorship and with students who have been sponsored, including corresponding with colleges and teachers for information
- To keep members informed, through Nabanga and other means, of activities, experiences, achievements and updated information relating to members or students which may be of interest to members (including a change of contact details), or relevant to the activities of BFoV, always within the terms of reference of BFoV and its constitutional purposes
- Members names and photographs may appear on the web site or in Nabanga in connection with reporting news about members and their activities; and committee members' contact details may be published in Nabanga or the web site, or be included in documents available on line such as Gift Aid declaration
- For all proper purposes in connection with the due administration and functioning of BFoV-CT, including co-operation with colleges and other institutions about the students whom we sponsor.

### **What is the legal basis for processing your personal data?**

BFoV is a members' organisation. Personal data about members is held with the consent of the member supplying that data, which is given for the purposes of becoming a member and taking part in the activities of the association. Members consent to BFoV processing the data in connection with, and for the purposes of, the management and operation of BFoV in accordance with the Constitution, and so as to fulfil BFoV's obligations to members. Personal data about students and applicants for student funding is received with their permission as a necessary part of BFoV's business of considering applications for funding and monitoring those students whose applications are successful.

Persons whose data is held by BFoV have a right to complain to the ICO (Information Commissioner's Office) if they think there is a problem with the way their data is handled that cannot be resolved by reference to BFoV.

### **Who else has access to your data?**

Except as set out in this document or required by law, no other organisation or individual outside BFoV has access to personal data which BFoV holds. BFoV will not sell or share any personal data with any third party, nor itself use that data for any other purpose than set out in this document. To ensure security of membership data BFoV will no longer make the membership list available to members on the web site until such time as a secure personal access can be offered to each member, but will provide copies of the membership list to members only on request.

### **Where is your data stored?**

The data about members is held in a computerised membership relational database and in email archives. Access to these systems (and their back-up records) is password-protected and confined to a small number of specified officers of BFoV (Chairman, Treasurer, Membership Secretary, Newsletter Editor and Gift Aid co-ordinator). Original membership application/renewal forms, Gift Aid Declarations and other documents which may contain personal data are securely held by one or more of the same people.

Data about student applicants for funding, and about students who are funded, will exist in e-mail archives within the committee, access to which is password protected.

BFoV policy is that archived data will be kept for at least six years after the date of acquisition, and for so long as the data subject remains a member. In practical terms, the data is held for the minimum period required for workable administration. Some data will be held for a period of six years after membership lapses in order to comply with any lawful request for production – for example Gift Aid declarations.

### **How to view your data or ask for it to be removed**

Under GDPR an individual has the following rights:

- The right to be informed what data is kept about him.
- The right of access to that data.
- The right to rectification of errors.
- The right to erase.
- The right to restrict processing.
- The right to data portability.
- The right to object to any use being made of it (including direct marketing).
- The right not to be subject to automated decision making and profiling.

If you wish to exercise any of the above rights, please contact the Chairman and we will provide you with a copy of all the data we hold connected with your name and/or your email address. We will aim to respond within one month.

### **Further processing**

If, in the future, BFoV needs or wishes to use personal data for a new purpose, not covered by this Data Protection Notice, a new notice will be published explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary and possible, BFoV will seek prior consent to the new processing.

### **How to contact us:**

British Friends of Vanuatu, 112 Fairfax Road, Teddington, TW11 9BX

Email: [chairman@british-friends-of-vanuatu.com](mailto:chairman@british-friends-of-vanuatu.com)  
or email: [membership@british-friends-of-vanuatu.com](mailto:membership@british-friends-of-vanuatu.com)

Website: [www.british-friends-of-vanuatu.com](http://www.british-friends-of-vanuatu.com)