



HONOURING THE ANCIENT DEAD

ENSURING RESPECT & DIGNITY FOR THOSE WHO HAVE GONE BEFORE
WWW.HONOUR.ORG.UK

Data Protection & GDPR Policy

Honouring the Ancient Dead (HAD) stores personal information of people who register an interest in volunteering for HAD ('volunteers') as well as those who sign-up to access restricted materials on HAD's website (www.honour.org.uk).

The General Data Protection Regulation (GDPR) introduced by the European Union, 25 May 2018, requires that personal information be protected in line with the regulations.

This document sets out HAD's response to GDPR.

Policies

1.	Data Controller HAD acts as a Data Controller, retaining personal information of volunteers and 'users' of its website – ' <i>HAD personal information</i> '. HAD believes that protection of personal information is important and requires that all who have access to HAD personal information adhere to the policies set out in this document.
2.	Data Processor HAD does not act as a Data Processor for any data. However, HAD does use Dropbox Inc. as a Data Processor and relies on the standards and policies of Dropbox for the protection of HAD personal data as set out at https://www.dropbox.com/security/GDPR HAD also uses MailChimp to send newsletters to volunteers periodically. Information on MailChimp's GDPR response may be found at https://kb.mailchimp.com/accounts/management/about-the-general-data-protection-regulation
3.	Data Protection Officer (DPO) HAD is not a public authority and does not engage in large scale data processing. Therefore, a DPO has not been appointed. DPO duties are undertaken by the HAD Secretary.
4.	Accountability

	HAD is comprised of the HAD Trustees (Charity ref. EW02473) and volunteers. HAD Trustees have sole and collective accountability for all HAD's affairs. Volunteers have no accountability. Therefore, all accountability for data privacy resides collectively with the HAD Trustees.
5.	<p>Access Hierarchy</p> <p>The key datastore of HAD personal information is the HAD Volunteers Excel spreadsheet. The master copy of which is housed with Dropbox. The access hierarchy is:</p> <ul style="list-style-type: none"> • HAD Secretary – owner, with Edit rights • HAD Trustees – Edit rights • HAD volunteers – no access (excepting as set out below in the Right of Access, Right to be Forgotten and Data Portability)
6.	<p>Data Lifecycle</p> <p>HAD personal information adheres to the following cradle-to-grave lifecycle:</p> <ol style="list-style-type: none"> 1. Provision of data and consent by volunteer via HAD website Contact form, email, telephone, personal contact, or other means 2. Validation by HAD Trustee 3. Entry of data into HAD Volunteers spreadsheet and MailChimp HAD newsletter list 4. Use of data by HAD for contact in relation to volunteering on HAD projects, newsletters, and any other business arising 5. Volunteer unsubscribing from newsletter or request removal from HAD volunteers 6. Trustee deletes volunteer personal information from HAD Volunteers spreadsheet, any email contact lists and website users 7. Volunteer's relationship with HAD ends
7.	<p>Consent</p> <p>With the introduction of GDPR, all HAD volunteers (existing and future) are requested to give specific consent to the storage of their personal information to be used as set out in the Data Lifecycle.</p>
8.	<p>Privacy by Design</p> <p>The HAD Volunteers spreadsheet is password protected to avoid unauthorized opening. The password is maintained by the HAD Secretary.</p> <p>The HAD Volunteers spreadsheet master is stored on Dropbox and is encrypted by default by Dropbox.</p> <p>All devices used by HAD Trustees to download, upload or access the HAD Volunteers spreadsheet must use local file encryption.</p>

	No email should be sent which includes the HAD Volunteers spreadsheet unless the email is sent using end-to-end encrypted communications.
9.	<p>Right to Access</p> <p>Any person listed in the HAD Volunteers spreadsheet has the right to a copy of the row of the spreadsheet relating to them.</p> <p>Access may be requested by sending an email to dataprivacy@honour.org.uk</p> <p>A copy of these policies will be provided too.</p>
10.	<p>Right to be Forgotten</p> <p>On receiving a validated request to be forgotten or withdrawal of consent to use personal data, step 6 of the Data Lifecycle will be enacted.</p>
11.	<p>Data Portability</p> <p>See Right to Access above.</p>
12.	<p>Breach Notification</p> <p>In the circumstances of a data breach coming to the attention of HAD Trustees that is likely to “result in a risk for the rights and freedoms of individuals”, notification of the breach details will be provided to everyone on the HAD Volunteers spreadsheet within 72 hours.</p>

HAD Personal Information

Data Retained

The full personal information defined as such and retained by HAD is:

- Name
- Email address
- Skype Name (if present)
- Region (within UK)
- Phone number
- Notes – primarily in relation to availability for volunteer work and interests

GDPR Guidelines (<https://www.eugdpr.org>)

Personal Data

Any information related to a natural person or 'Data Subject', that can be used to directly or indirectly identify the person. It can be anything from a name, a photo, an email address, bank details, posts on social networking websites, medical information, or a computer IP address.

DPOs

DPOs must be appointed in the case of: (a) public authorities, (b) organizations that engage in large scale systematic monitoring, or (c) organizations that engage in large scale processing of sensitive personal data (Art. 37).

Breach Notification

Under the GDPR, breach notification will become mandatory in all member states where a data breach is likely to "result in a risk for the rights and freedoms of individuals". This must be done within 72 hours of first having become aware of the breach. Data processors will also be required to notify their customers, the controllers, "without undue delay" after first becoming aware of a data breach.

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