

Data Protection & GDPR Policy

Purpose

Repair & Share Foyle is committed to complying with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. This policy sets out how we collect, process, store, and share personal data in accordance with legal obligations, ensuring the protection of the rights of individuals.

Scope

This policy applies to all employees, volunteers, contractors, and Board members who handle personal data on behalf of the organisation. It covers all personal data processed in any format, including electronic, paper, and other storage media

Reference	Version	Date released	Approved by	
RSF-004	1		Caroline	
			McGuinness-Brooks	

This policy is communicated and published on the company website for all interested parties.

This policy is subject to periodic review and change to ensure it remains valid. The policy may be reviewed when prompted by context, such as developments in legislation, industry practice, or the organisation.

The live version of this policy can be found in the employee handbook and is the only version that is controlled.

Reference: RSF-004 | Version: 1



Principles of Data Protection

We adhere to the following data protection principles:

- Lawfulness, fairness, and transparency
- Purpose limitation
- Data minimisation
- Accuracy
- Storage limitation
- Integrity and confidentiality
- Accountability

Lawful Basis for Processing Data

Repair & Share Foyle processes personal data on the following lawful bases:

- **Consent**: Where explicit consent has been obtained from individuals.
- **Contractual Necessity**: To fulfil contractual obligations.
- Legal Obligation: To comply with applicable laws.
- **Legitimate Interests**: Where the organisation has a valid interest that does not override individual rights.

Data Subject Rights

Individuals have the following rights under UK GDPR:

- Right to be informed
- Right of access
- Right to rectification
- Right to erasure ("Right to be forgotten")
- Right to restrict processing
- Right to data portability
- Right to object
- Rights in relation to automated decision-making and profiling

Requests regarding these rights should be directed to the Programme Lead.

Data Collection and Processing

The organisation collects and processes personal data for the following purposes:

- Employee and volunteer administration
- Service delivery and beneficiary support
- Fundraising and donor management

Reference: RSF-004 | Version: 1



- Marketing and communications (with consent)
- Compliance with legal and regulatory obligations

Data Security and Storage

We implement appropriate technical and organisational measures to protect personal data from unauthorised access, loss, or disclosure. These include:

- Secure password policies and access controls
- Encryption and secure storage of digital records
- Confidentiality agreements with staff and volunteers
- Regular data protection training

Personal data is retained only as long as necessary and securely disposed of when no longer required.

Data Sharing and Third-Party Processors

Repair & Share Foyle may share personal data with trusted third parties where necessary, ensuring appropriate data protection agreements are in place. This includes:

- Regulatory bodies and authorities (where required by law)
- Service providers under contractual obligations
- Funders and partners (only where consent has been obtained)

Data Breach Response

In the event of a data breach:

- 1. The Programme Lead will assess the severity and impact.
- 2. Where necessary, the Information Commissioner's Office (ICO) and affected individuals will be notified within 72 hours.
- 3. Measures will be implemented to prevent recurrence.

Responsibilities and Compliance

- The Board: Ensures organisational compliance.
- The Programme Lead: Manages data protection efforts.
- All Employees & Volunteers: Responsible for handling data in compliance with this policy.

Failure to comply with this policy may result in disciplinary action.

Reference: RSF-004 | Version: 1