

# Rotherfield Millennium Green Trust CIO



## Privacy Policy

### Context

Rotherfield Millennium Green Trust (the “Charity”) is a small charity holding a limited amount of non-sensitive information on a small number of people.

The Trustees understand and accept their responsibility under the UK General Data Protection Regulation (UK GDPR) to hold all personal data securely and use it only for legitimate purposes and with the knowledge and approval of the data subjects.

### Objectives in relation to personal data

The Charity aims to ensure that all personal data that it holds will be:

- Processed lawfully, fairly and in a transparent manner;
- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- Adequate, relevant and limited to what is necessary;
- Accurate and updated as soon as reasonably possible after notification of a change;
- Kept in a form which permits identification of data subjects for no longer than is necessary;
- Processed in a manner that ensures appropriate security of personal data, including protection against accidental loss, destruction or damage.

### Our approach

Through the operational procedures of the Trust, the Trustees undertake to uphold the principles and requirements of UK GDPR in a manner which is proportionate to the nature and scale of personal data being held by the Charity.

These procedures are based on the Trustees’ assessment in good faith, of the potential impacts on both the Charity and its data subjects of the personal data held by the Charity being stolen, abused, corrupted or lost.

Two key processes underpin our approach to data protection; obtaining consent to use personal data, and, the use of a Privacy Notice.

- **Obtaining consent**

The largest group for which the Charity holds personal data is the supporters of the Trust (“Friends”). In this case we will seek explicit consent to use individual’s data at the time that the data is obtained. We do this by explaining how we intend to use personal data collected and providing an opt-in tick box on the Friends Membership Application form. At this point we also provide a reference to the Trust’s Privacy Notice for further details.

- **Privacy Notice**

The Charity has a Privacy Notice which it will make available to everyone on whom it holds and processes personal data. This privacy notice tells data subjects what to expect us to do with their personal information when they support, or work with, the Charity.

In the case of data obtained directly from the data subject, the location of the Privacy Notice on the Trust’s website will be highlighted at the time the data is obtained. In all other cases, the Privacy Notice will be made available on request.

## **Review Process**

This policy will be reviewed annually or as needed to ensure it remains relevant and effective.

Adopted 12th September 2024

Next Review September 2025