

Sustainable St Albans: Data Protection Policy

Date agreed:	February 2024
Agreed by:	Sustainable St Albans (SSA) Trustee Board
Last reviewed:	August 2025
Next review due:	August 2027

Statement of policy

Sustainable St Albans ('SSA') Trustee Board is committed to protecting and respecting the personal data that we hold. This Data Protection Policy describes why and how SSA collects and uses personal data and provides information about individuals' rights. It applies to personal data provided to SSA, both by individuals themselves or by others. SSA may use personal data provided to SSA for the purposes described in this Data Protection Policy or as made clear before collecting personal data.

Personal data is any information relating to an identified or identifiable living person. When collecting and using personal data, the SSA policy is to be transparent about why and how SSA processes personal data.

SSA processes and controls personal data for several purposes, and the means of collection, lawful basis of processing, use, disclosure, and retention periods for each purpose are set out in the relevant sections below. The personal data that is provided to SSA is provided either directly from the individual concerned or from a third party acting on behalf of an individual.

Where SSA receives personal data that relates to an individual from a third party, SSA will request that this third party informs the individual of the necessary information regarding the use of their data. Where necessary, reference may be made to this Data Protection Policy.

The relevant legislation

The Data Protection Act 2018 relates to the handling of all data including employee information, client or customer related data. Data under the Act breaks down into two categories - ordinary personal data and sensitive personal data. The Act requires SSA to take additional steps to protect sensitive personal data, although we would not expect to process or control sensitive personal data in the normal course of operations.

Security

SSA takes the security of all the data held by SSA seriously. Relevant personnel and all Trustees are made aware of their responsibilities for data protection, confidentiality and security prior to handling data.

SSA has policies and procedures which ensure SSA regularly reviews the appropriateness of the measures in place to keep the data held secure, including this Data Protection Policy.

All information an individual or organisation provides to SSA is stored on our secure servers and networks.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Data that we hold

Volunteers, supporters and Members

SSA is a charitable incorporated organisation, led by members of the community of St Albans and District. SSA invites supporters and members to share their personal data with SSA so that they can be kept informed about what SSA does and how they can play their part in the organisation and its activities. Members have governance responsibilities to vote at Annual General Meetings.

Why does SSA process data?

Where data is collected for Trustees, Supporters and Members, it is used for a number of purposes, as follows:

- Providing services to you. SSA sends regular email newsletters about our work using your consent as the legal basis for processing your data;
- Administration. SSA uses its legitimate interests as a charity to keep a record of members to keep them informed about meetings and to ensure SSA knows who can vote at annual general meetings;
- SSA also uses its legitimate interests to record details of people who have taken part in SSA activities, such as borrowing the thermal cameras, or hosting an open food garden. SSA also uses this information to contact individuals about their participation in these activities.

What data is processed?

SSA keeps the names, email addresses and if provided the home addresses of members. SSA also keeps a record of the same data about people who have taken part in SSA activities. SSA also keeps financial records of any supporters who have given a donation and do not wish to remain anonymous. SSA would not ordinarily process or control sensitive personal data.

How long do we hold data for?

SSA retains the personal data processed by SSA for as long as is considered necessary for the purpose(s) for which it was collected. There may also be occasions which will require data to be kept for longer; however, this will typically be for legal purposes, such as to record a Gift Aided donation, up to a maximum of seven years.

In addition, personal data may be securely archived with restricted access and other appropriate safeguards where there is a need to continue to retain it. SSA will periodically review this data, to ensure that it is still relevant and necessary.

Our people

SSA collects personal data for trustees, volunteers, supporters and Members as part of the administration, management and promotion of SSA activities.

Trustees

SSA has a board of trustees to oversee the charity and provide good governance. The main purpose that trustees' personal data are collected is for administration and management, as well as for statutory reporting to the Charity Commission.

Personal data collected about trustees is held for as long as necessary in order to fulfil the purpose for which it was collected, or for a maximum of one year after those purposes no longer become necessary. Personal data about trustees recorded on minutes or agendas will be kept as a record of the charity's activities and will ultimately be archived in its records.

Volunteers

SSA works with volunteers to deliver day to day activity in the running of our projects. The main purpose that volunteers' personal data are collected is for administration and management.

Personal data collected about volunteers is held for as long as necessary in order to fulfil the purpose for which it was collected, or for a maximum of one year where those purposes no longer become necessary. Personal data about volunteers recorded on health and safety documentation, minutes or agendas will be kept as a record of the charity's activities and will ultimately be archived in its records.

Suppliers

SSA collects and processes personal data about its suppliers, subcontractors, and individuals associated with them. The data is held to manage our relationship, to contract and receive services from them.

Why does SSA process data?

- Receiving goods and services. SSA processes personal data in relation to its suppliers and their personnel as necessary to receive their services.
- Providing services to event attendees and supporters. Where a supplier is helping SSA to deliver these services, SSA processes personal data about the individuals involved in providing the services in order to administer and manage the relationship with the supplier and the relevant individuals and to provide such services to those SSA is serving.
- Administering, managing and developing our services. SSA processes personal data in order to run the charity, including:
 - Managing relationship with suppliers;
 - maintaining and using IT systems;
 - hosting, or facilitating the hosting, of events; and
 - administering and managing the SSA website, IT systems and applications.
- Security, quality and risk management activities. SSA has security measures in place to protect meeting attendees' and supporters' information (including personal data), which involve detecting, investigating and resolving security threats. Personal data may be processed as part of the security monitoring that SSA undertakes; for example, automated scans to identify harmful emails. SSA has policies and procedures in place to monitor the quality of SSA services and manage risks in relation to suppliers. SSA collects and holds personal data as part of the SSA supplier contracting procedures. SSA monitors the services

provided for quality purposes, which may involve processing personal data. SSA requires all trustees to have two factor authentication for all SSA related activity.

- Payment for services provided to SSA.

What data do we hold?

SSA will hold supplier's names, contact details (email and/or residential address, telephone number(s)), and in some circumstances their financial details.

How long do we hold data for?

SSA retains the personal data processed by SSA for as long as is considered necessary for the purpose for which it was collected (including as required by applicable law or regulation). Data may be held for longer periods where required by law or regulation and in order to establish, exercise or defend our legal rights; ordinarily this would be up to a maximum of seven years.

People who use the SSA website

When people visit the SSA website, no personal data is collected through automated tracking and interacting with various forms on the website or apps (collectively referred to as the websites).

Personal data is collected when individuals fill in forms on the websites or by corresponding with SSA by phone, e-mail or otherwise. This includes information provided when an individual registers to use the SSA websites, subscribe to a newsletter, service, or makes an enquiry.

Sharing personal data

SSA will only share personal data with others when legally permitted to do so. When SSA shares data with others, SSA puts contractual arrangements and security mechanisms in place to protect the data and to comply with SSA data protection, confidentiality and security standards.

Personal data held by SSA may be transferred to:

- Third party organisations that provide applications/functionality, data processing or IT services to us. We use third parties to support us in providing our services and to help provide, run and manage our internal IT systems. For example, providers of information technology, cloud-based software as a service provider, identity management, website hosting and management, data analysis, data back-up, security and storage services. The servers powering and facilitating that cloud infrastructure are located in secure data centres around the world, and personal data may be stored in any one of them;
- Third party organisations that otherwise assist SSA in providing goods, services or information, such as event facilitators;
- Law enforcement or regulatory agencies or those required by law or regulation, such as passing contact details to HMRC if SSA processes Gift Aid donations, or for accounting books and records.

It is possible that SSA could receive requests from third parties with authority to obtain disclosure of personal data, such as to check that SSA is complying with applicable law and regulation, to investigate an alleged crime, to establish, exercise or defend legal rights. SSA will only fulfil requests for personal data where SSA is permitted to do so in accordance with applicable law or regulation.

Locations of stored data

The location of stored personal data is the responsibility of the Board of Trustees of SSA and is reviewed on an annual basis. Any concerns should, in the first instance, be raised with the Comms team.

Individual's Rights

Individuals have certain rights over their personal data and SSA as a data controller is responsible for fulfilling these rights as follows:

- Individuals may request access to their personal data held by SSA as a data controller;
- Individuals may request SSA to rectify personal data submitted to SSA or, where appropriate, contact SSA via the relevant website registration page or by amending the personal details held on relevant applications with which they registered;
- Individuals may request that SSA erases their personal data;
- Where SSA processes personal data based on consent, individuals may withdraw their consent at any time by contacting SSA or clicking on the unsubscribe link in an email received from SSA;
- Individuals may have other rights to restrict or object to SSA processing of personal data and the right to data portability;
- Individuals may request information about, or human intervention into, any automated data processing that SSA may undertake.

If an individual wishes to exercise any of these rights, they can send an email to info@sustainablestalbans.org.uk.

Complaints

Should an individual wish to complain about the use of personal data by SSA, they should send an email with the details of the complaint to info@sustainablestalbans.org.uk. SSA will look into and respond to any complaint received within 7 days.

An individual also has the right to lodge a complaint with the UK data protection regulator, the Information Commissioner's Office (ICO). For further information on those rights and how to complain to the ICO, see the ICO website <https://ico.org.uk/concerns>

Data collection and contact information

Any questions about this Data Protection Policy or how and why SSA processes personal data, please contact trustees@sustainablestalbans.org.uk.

Changes to our Data Protection Policy

Updates to this Data Protection Policy will be published on our website.

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