



## SEN-ACTIVE COMMUNITY GLOW CIC

# Data Protection Policy

Reviewed: May 2026

## Sen-Active Community Glow CIC Data Protection Policy

**Effective Date: 18-5-26**

### 1. Policy Statement & Purpose

Sen-Active Community Glow CIC is committed to protecting the privacy and security of the personal data we process. Our data protection policy outlines how we comply with data protection laws, ensuring the rights of individuals are respected and safeguarded.

#### Scope of the Policy

- This policy applies to all personal data processed by Sen-Active Community Glow CIC, including data from website visitors, volunteers, directors, funders, and beneficiaries/service users.
- It covers all forms of data processing, whether collected in person, via social media, through paper or online forms, and includes data stored in cloud services, paper files, local computers, and emails.

#### Applicability

- This policy applies to all employees, volunteers, directors, trustees, and anyone acting on behalf of Sen-Active Community Glow CIC.

### 2. Legal Framework

Sen-Active Community Glow CIC is committed to complying with the following UK data protection legislation:

- **UK General Data Protection Regulation (UK GDPR)**
- **Data Protection Act 2018**
- **Privacy and Electronic Communications Regulations (PECR)** (as applicable)

### 3. The 7 Data Protection Principles

We adhere to the following principles as set out in Article 5 of the UK GDPR:

#### **Lawfulness, Fairness, and Transparency**

- We process personal data lawfully, fairly, and transparently, ensuring individuals are aware of why their data is being collected and how it will be used.

#### **Purpose Limitation**

- Data is collected for specified, explicit, and legitimate purposes and not further processed in a manner incompatible with those purposes.

#### **Data Minimisation**

- We only collect data that is adequate, relevant, and limited to what is necessary for the intended purpose.

#### **Accuracy**

- We take reasonable steps to keep personal data accurate and up to date, correcting inaccuracies without delay.

#### **Storage Limitation**

- Personal data is retained no longer than necessary. The standard retention period is six years after the last contact.

#### **Integrity and Confidentiality (Security)**

- We implement appropriate technical and organisational measures to protect personal data against unauthorised or unlawful processing and accidental loss, destruction, or damage.

#### **Accountability**

- We maintain records of data processing activities and ensure compliance with data protection principles through regular audits and reviews.

### 4. Lawful Bases for Processing

We determine the lawful basis for processing personal data based on the data subject category:

- **Website Visitors:** Consent for analytics cookies and legitimate interests for essential cookies.
- **Volunteers:** Contractual necessity and legitimate interests.
- **Directors:** Legal obligation and legitimate interests.
- **Funders:** Consent for marketing communications and contractual necessity.
- **Beneficiaries/Service Users:** Consent for specific services and legitimate interests for service provision.

## **Consent**

- Where consent is the lawful basis, it must be freely given, specific, informed, and unambiguous. Consent is recorded and can be withdrawn at any time.

## **5. Individual Rights**

Individuals have the following rights under Chapter III of the UK GDPR:

### **Right to be Informed**

- Individuals are informed about the collection and use of their data through our privacy notices.

### **Right of Access**

- Individuals can request access to their personal data via a Subject Access Request (SAR). Requests should be made to Gavin Wood at [senactive.cic@gmail.com](mailto:senactive.cic@gmail.com) and will be responded to within one month.

### **Right to Rectification**

- Individuals can request correction of inaccurate or incomplete data.

### **Right to Erasure**

- Also known as the 'right to be forgotten,' individuals can request data deletion under certain conditions.

### **Right to Restrict Processing**

- Individuals can request the restriction of their data processing under specific circumstances.

### **Right to Data Portability**

- Individuals can request their data in a structured, commonly used, and machine-readable format.

### **Right to Object**

- Individuals can object to processing based on legitimate interests or direct marketing.

### **Rights Related to Automated Decision-Making**

- Sen-Active Community Glow CIC does not use automated decision-making processes.

## **6. Special Category Data**

We process the following special category data: criminal records/DBS checks, health information, and children's data.

### **Definition and Conditions**

- Special category data requires additional protection and must meet conditions under Article 9(2) of the UK GDPR, such as explicit consent or substantial public interest.

### **Enhanced Security Measures**

- Special category data is protected with encryption, access controls, and secure storage methods.

### **Explicit Consent**

- Where required, explicit consent is obtained and documented.

## **7. Children's Data**

### **Specific Requirements**

- Age verification is conducted for processing children's data. Parental consent is obtained for those under 13.
- Child-friendly privacy notices are provided, and data processing is limited to necessary purposes.

## **8. Website and Online Privacy**

### **Cookie Policy**

- Our website uses cookies, and users are informed about their use with options to consent or opt-out where applicable.

### **Online Forms and Data Collection**

- Online forms are secure, and data collected is used for specified purposes only.

### **Website Analytics**

- We use Google Analytics to understand website usage, ensuring data is anonymised where possible.

### **Third-Party Integrations**

- Third-party services are vetted for compliance with data protection standards.

### **Privacy Notice**

- A comprehensive privacy notice is available on our website detailing our data collection and processing practices.

## **Data Security Measures**

### **Technical Security Measures**

- Data is encrypted in transit and at rest.

- Access controls and strong passwords are enforced.

### **Organisational Security Measures**

- Regular training on data protection policies is provided.
- Data protection procedures are regularly reviewed and updated.

### **Physical Security Measures**

- Paper files are stored in locked cabinets, with access restricted to authorised personnel.

### **Staff Responsibilities**

- All staff are responsible for ensuring compliance with data protection policies and practices.

## **Data Breach Response**

### **Definition and Reporting**

- A data breach is a security incident leading to accidental or unlawful data destruction, loss, alteration, unauthorised disclosure, or access.
- Breaches must be reported immediately to the Data Protection Lead, Gavin Wood.

### **Notification Requirements**

- The ICO is notified within 72 hours if a breach presents a risk to individuals' rights and freedoms.
- Affected individuals are informed without undue delay.

### **Breach Documentation**

- All breaches are documented, including details of the breach, impact, and remedial actions taken.

## **Subject Access Request (SAR) Procedure**

### **Making a Request**

- Requests can be made via email to Gavin Wood at [senactive.cic@gmail.com](mailto:senactive.cic@gmail.com).
- Identity verification is required.

### **Response Timeframe**

- Requests are responded to within one month, extendable to three months for complex requests.

### **Exemptions**

- Certain exemptions may apply, and these will be communicated to the requester if applicable.

## **Data Retention**

### **Retention Principles**

- Data is retained for no longer than necessary, with a standard retention period of six years after contact.

### **Secure Deletion**

- Data is securely deleted when no longer needed, using appropriate methods for the medium.

### **Archive Policies**

- Data required for archival purposes is securely stored and access limited.

## **Data Sharing**

### **Data Processing Agreements**

- Agreements are in place with funders and grant makers to ensure data protection compliance.

### **Due Diligence**

- Thorough checks are conducted on third-party processors.

### **International Transfers**

- International data transfers are not applicable at this time.

## **Roles and Responsibilities**

### **Data Protection Lead**

- Gavin Wood oversees data protection compliance and is the primary contact for data protection matters.

### **Board/Trustee Oversight**

- The Board are responsible for ensuring high-level compliance and risk management.

### **Staff Responsibilities**

- All staff must adhere to data protection policies and undertake regular training.

## **Policy Review**

### **Annual Review**

- This policy is reviewed annually to ensure continued compliance and effectiveness.

### **Version Control**

- Changes are documented, and new versions communicated to staff and stakeholders.

### **Key Contacts**

- **Data Protection Lead:** Gavin Wood
- **Email:** senactive.cic@gmail.com
- **Information Commissioner's Office (ICO):**
  - **Website:** ico.org.uk
  - **Helpline:** 0303 123 1113

This policy outlines our commitment to data protection and ensures that personal data is handled with the utmost care and respect. We encourage all stakeholders to familiarise themselves with this policy and reach out to our Data Protection Lead with any questions or concerns.

Signed:

Policy Review Date – May 2029