

British Forces Foundation Data Protection Policy



In line with the new General Data Protection Regulation (GDPR) 2018 implementation The British Forces Foundation (BFF) requires a Data Protection Policy.

1. Management Commitment

BFF Management are committed to ensuring the safe and legal requirements to maintain data held. The BFF Trustees, Managing Director and the Data Controller are fully accountable for any mismanagement or breach of security.

The BFF Trustees agreed that there is no need for a Data Protection Officer and appoint Pepi O'Neill as Data Controller.

2. Definitions of Personal Data

Personal data held by BFF will include (where applicable)

- a. Address – home and work
- b. Phone numbers, mobile, residential and work
- c. Name of individual and spouse
- d. Emails and web address
- f. Information of events attended
- g. Information of donations given
- h. Information of areas of interest with in BFF

3. Legal rights of data subjects

BFF will ensure the right for data subjects to access the information we hold about them.

4. The legal principles relating to processing of personal data

BFF is obliged to ensure secure data management

5. Obtaining Consent

- a. all data subjects will be written to and asked to positively opt in to the BFF Database
- b. BFF will not use pre-ticketed boxes or any other type of consent by details
- c. BFF will use clear and plain language
- d. Data subject will be informed of right to revoke their consent at any time
- e. Revocation of consent is as easy to do as giving consent and is acted upon without undue delay
- f. The purpose for which the data is being used is distinct and legitimate and explained in clear, easily understood and transparent terms.
- g. BFF Will keep a record of when and how the consent was obtained and what the data subject was told at the time

6. Subject access rights

Any individual who makes a valid subject access request is entitled to be:

- a. Told whether their personal data is being processed:
- b. Given a description of the personal data, reason for processing and whether it has been shared with any other organisations or persons;
- c. Given details of the source of the data (where this is applicable)
- d. Given the right to rectify, object to, or restrict processing of personal data;
- e. Given the 'right to be forgotten' as set out in Article 17 of the GDPR,
- f. Given details of how long their information will be retained for.

Individuals are only entitled to their own personal data, and not to information relating to other people, unless they are acting on behalf of that person, in these circumstances, written consent will be required.

7. Management of personal data

- a. *Requests by individuals*
Individuals can request in writing to the Data Controller for any information that BFF hold
- b. *Complying with requests*
BFF will comply within 1 month to a request and will provide the necessary information
- c. *Deleting personal information*
If requested in writing BFF will delete all personal information held
- d. *What information will be provided in response to a request*
BFF will provide all necessary information requested by an individual
- e. *How will data be provided*
All information will be provided in electronic format, unless otherwise specified.

8. How to complain

- a. An individual can complain in writing to the Data Protection Officer, British Forces Foundation 10A High Street, Pewsey, Wiltshire SN9 5AQ
- b. The complaint will be dealt with in 10 working days from the complaint being made
- c. The complaint will be dealt with by an appropriately trained member of staff

9. Risk Assessment

- BFF will :
- a. do random checks to ensure technical controls are working
 - b. keep a record of regular backups and restore operations to test backup is working
 - c. record all breaches that have been reported (including time, outcomes, remediation, lessons learned).

10. Training

- BFF will undertake to train all necessary staff to :
- a. understand the principles of data protection
 - b. what is personal data
 - c. how to report a potential breach
 - d. legal rights of data subjects
 - e. how data is collected
 - f. how to deal with a data subject request
 - g. how to verify the identity of the data subject

11. Annual review

BFF will conduct reviews annually of the personal data held, the source of personal data and whom it is shared with.

Signed

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**British Forces Foundation
Chief Executive**

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**British Forces Foundation
Trustee**

Dated

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