



Privacy Notice

Scope

This notice applies to all Data Subjects (individuals) whose data is controlled and processed by The Nehemiah Project.

Responsibilities

The Data Protection Manager (DPM) is responsible for ensuring that all potential Data Subjects have sight of this notice prior to the collection and/or processing of their personal data by Nehemiah.

Privacy or Fair Processing Notice

The Nehemiah Project will use the personal data collected from you for the following purposes:

Marketing

Subscribers to our newsletters and other communications confirm their consent to The Nehemiah Project's use of personal data for the aforementioned purposes(s) and grant The Nehemiah Project permission to process their personal data to carry out those actions and/activities. Anyone may withdraw their consent at any time by using the unsubscribe function that is included in all our electronic newsletters, by following our Right to Withdraw Consent Procedure, or by emailing enquiries@tnp.org.uk

Accounting purposes - if you donate money to The Nehemiah Project on either a regular or occasional basis, we are required by law to record your donation and your contact details, and to keep these on file for seven years. If you have completed a Gift Aid declaration, we will also keep this on file, and use the details for processing our Gift Aid claims. We keep these personal data on the basis of legal obligation.

What is Personal Data?

The EU's General Data Protection Regulation ("GDPR") defines "personal data" as:

"any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".

Article 9 of the GDPR classifies certain data as belonging to "special categories", as follow:

- Racial origin
- Ethnic origin
- Political opinions

- Religious beliefs
- Membership to a trade-union
- Genetic data
- Biometric data
- Health data
- Data concerning a natural person's sex life
- Sexual orientation

The GDPR requires that consent is provided by the Data Subject for all types of personal data, including those pertaining to the special categories set out above and otherwise. Consent must be explicitly provided.

When The Nehemiah Project requests sensitive data from Data Subjects, it is required to confirm why the information is required and how it will be used.

Why does The Nehemiah Project need to collect and store personal data?

The Nehemiah Project is committed to ensuring that all personal information collected and processed is appropriate for the stated purpose(s) and shall not constitute an invasion of your privacy. We may share your personal data with third party service providers who are contracted by us and we shall ensure that they will hold your personal data securely and shall use it only in order to fulfill the service for which they are contracted. When there is no longer a service need, or the contract comes to an end, the third party will dispose of all personal data according to our procedures. We will never share your personal data with third parties until we have received your consent, unless we are required do so by law. We do not make a practice of sharing our supporter data for any purpose other than legal obligation.

How The Nehemiah Project uses your information

The Nehemiah Project will process your data (i.e. collect, store and use) according to the requirements of the GDPR at all times and shall endeavour to keep your personal data up-to-date, ensuring its accuracy; we will not keep it for longer than it is required. In some situations, there are set legal requirements for the length of time that The Nehemiah Project will retain your personal data but usually The Nehemiah Project will use its discretion, ensuring that personal data is not kept outside of our usual business requirements.

We shall never be intrusive or invasive of your personal privacy and shall not ask you to provide data that is irrelevant or unnecessary and we will enact strict measures and processes to ensure that the risk of unauthorised access or disclosure of your personal data is minimised.

We will only use your personal data for the following purposes:

- Emailing newsletters and information about our charitable activities
- Accounting purposes, for donors
- Gift Aid claims, where authorised

Individual rights

Under the GDPR individuals have the following rights:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling.

The Nehemiah Project respects these rights, and will act promptly following any enquiries from an individual concerning these rights. Anyone who is concerned about the personal data held by The Nehemiah Project about themselves should contact the Data Protection Manager, via enquiries@tnp.org.uk

Document owner

The Data Protection Manager is the owner of this policy document and must ensure that it is periodically reviewed according to the review requirements contained herein.

This policy document was approved by The Nehemiah Project's Board of Trustees and is issued by the Chief Executive Officer (CEO) on a version-controlled basis.

Name of CEO: Dr John Patience

Date: 14/05/2018