



## Data Protection & Confidentiality

### Confidentiality

All staff and volunteers have a duty to respect the confidentiality of customers and colleagues. The HFS employment contract and induction training make clear that a breach of confidentiality will be considered a serious disciplinary issue that may result in dismissal.

### Data Protection

HFS regards the lawful and correct treatment of personal information as immensely important to its successful operations and to maintaining confidence between the organisation and those with whom it carries out business.

HFS is fully committed to the principles of the GDPR. There are principles put in place by the regulations to make sure that information is handled properly.

Data must be:

- fairly and lawfully processed
- processed for limited purposes
- adequate, relevant and not excessive
- accurate
- not kept for longer than is necessary
- processed in line with your rights
- secure
- not transferred to countries without adequate protection

HFS will therefore follow procedures which aim to ensure that all employees who have access to any personal data held by or on behalf of the organisation are fully aware of and abide by their duties under the GDPR.

We will specifically ensure that:

- Everyone managing and handling personal information understands that they are contractually responsible for following good data protection practice and is appropriately trained
- Everyone managing and handling personal information is appropriately supervised
- Queries about handling personal information and access requests are promptly and courteously dealt with
- Methods of handling personal information are regularly assessed and evaluated
- Monitoring of sensitive personal information for equal opportunities monitoring will be anonymous and separate from customer or personnel records

## Roles and responsibilities

The Data Controller is Naomi Ridley, Chief Executive of HFS. The Senior Information Rights Officer is Claire Davies, trustee of HFS.

**All managers and staff** within the organisation will take steps to ensure that personal data is kept secure at all times against unauthorised or unlawful loss or disclosure and will ensure that:

- Paper files and other records or documents containing personal data are kept in a secure environment
- Personal data held on computer systems is protected by the use of secure passwords
- Obsolete records are disposed of securely

## Data we hold

HFS maintains a list of the types of data we hold, the reason for processing the data, how long it will be held and how it will be disposed of, which is attached to this policy. This is subject to a regular audit.

## Individual Rights to information

Individuals have rights to information under the GDPR. We interpret this as follows:

Rights	Meaning for individuals	Meaning for HFS
To be informed	You should be informed of how your data is collected, stored and processed	This information will be provided in this policy, on request, and in our Privacy Statements
To access	You can request access to a copy of your data in electronic form and details of how it is processed	We will provide this, free of charge, within one month
To rectify	You are entitled to have data corrected if it is inaccurate or incomplete	We will do this within 2 months
To erasure	You are able to ask for the deletion of your data	We will do this within one month, unless we have a strong, valid reason
To restrict processing	You can request a halt on processing if you object to accuracy or purpose	We will make an immediate stop temporarily while the issue is resolved
To data portability	You can request your data in a suitable digital format to be sent to you or to a third party	We will do this within 2 months
To object	You can in certain cases object to the processing of your data e.g. in direct marketing	We will provide reasonable means to object and act on objections within one month
In relation to automated decision-making	You can object to potentially damaging decisions being taken based only on automated data processing	We will allow individuals to object and request human intervention

## Future Planning

Data Protection will be considered as part of the planning process for future projects and service developments.

## Breaches

If HFS suffers a security breach and personal data is compromised we will notify the ICO within 72 hours.

## **Privacy Notice for HFS stores**

### **What information is being collected?**

HFS collects some personal data in order to organise sales, deliveries and collections of donated goods. Information like your name, address, phone number, items of furniture bought or donated, how you heard about the charity are collected.

### **Will my information be shared with third parties?**

No.

### **What is the legal basis for processing it?**

You are contracting HFS to provide goods or services and we need the information in order to do it.

### **How will the information be used?**

The information is used to provide the service you have requested.

We also anonymise and collate data such as how you heard about us and the items of furniture reused so that we can measure our charity's performance.

Monitoring forms that ask for sensitive data such as disability, ethnicity, and age are anonymous.

### **How long will it be stored for?**

Financial data (e.g. receipts) may be kept for 6 years.

### **What rights do I have?**

You have the right to:

- Request access to an electronic copy of your data and details of how it is processed
- Have data corrected if it is inaccurate or incomplete
- Ask for deletion of your data
- Ask for a halt or pause on processing if you object to accuracy or purpose
- Object to processing of your data e.g. in direct marketing

### **How can I complain?**

You can complain in writing to the Data Controller for HFS, Naomi Ridley, [naomi@hfs.org.uk](mailto:naomi@hfs.org.uk) or at HFS Hastings 6-10 Dorset Place, Hastings TN34 1LG