

## Heartlands Cystic Fibrosis Centre Charity GDPR Policy

This privacy and data protection policy sets out how Heartlands Cystic Fibrosis Centre Charity uses and protects any personal information that you consent to providing. Heartlands Cystic Fibrosis Centre Charity will ensure that your privacy and personal data is protected as governed by the General Data Protection Regulation 2016/679.

Last updated	February 2019
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### Definitions

<b>Charity</b>	means Heartlands Cystic Fibrosis Centre a registered charity no 1074745 .
<b>GDPR</b>	means the General Data Protection Regulation.
<b>Responsible Person</b>	David Allbones
<b>Register of Systems</b>	means a register of all systems or contexts in which personal data is processed by the Charity.

### 1. Data protection principles

The Charity is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.”

### 2. General provisions

- a. This policy applies to all personal data processed by the Charity.

- b. The Responsible Person shall take responsibility for the Charity's ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.
- d. The Charity shall register with the Information Commissioner's Office as an organisation that processes personal data.

### **3. Lawful, fair and transparent processing**

- a. To ensure its processing of data is lawful, fair and transparent, the Charity shall maintain a Register of Systems.
- b. The Register of Systems shall be reviewed at least annually.
- c. Individuals have the right to access their personal data and any such requests made to the charity shall be dealt with in a timely manner.

### **4. Lawful purposes**

- a. All data processed by the charity must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests ([see ICO guidance for more information](#)).
- b. The Charity shall note the appropriate lawful basis in the Register of Systems.
- c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- d. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the Charity's systems.

### **5. Data minimisation**

- a. The Charity shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- b. The data will be stored on an NHS password protected computer drive.

### **6. Accuracy**

- a. The Charity shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.
- c. Accuracy of data will be checked every 5 years by contacting those on the charity database.

### **7. Archiving / removal**

- a. To ensure that personal data is kept for no longer than necessary, the Charity shall put in place an archiving policy for each area in which personal data is processed and review this process annually.
- b. The archiving policy shall consider what data should/must be retained, for how long, and why.

### **8. Security**

- a. The Charity shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c. When personal data is deleted this should be done safely such that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions shall be in place.

## **9. Breach**

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the Charity shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO ([more information on the ICO website](#)).

## **10. References and Links**

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/>

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32016R0679>

**Heartlands Cystic Fibrosis Centre Charity**

**DATA PROTECTION CONSENT**

**We would like to keep you informed about Heartlands Cystic Fibrosis Centre Charity. Please complete this form to consent to us contacting you.**

<b>Please read the following options and select your preference for each</b>	<b>YES</b>	<b>NO</b>
Would you like to receive information about Heartlands Cystic Fibrosis Centre Charity and fundraising events?		
Do you give permission for Heartlands Cystic Fibrosis Centre Charity to keep a confidential written and electronic record of your details, which will be stored securely in accordance with the requirements of the Data Protection Act and the EU General Data Protection Regulations?		

**Communication preferences**

Please select how you would like us to communicate with you. You can select more than one option. Please complete with your contact details:

- Email       Post

<b>Name</b>	
<b>Address</b>	
<b>Email address</b>	

Signature:..... Date .....

Print Name .....

Please return this form to ;

David Allbones, CF Centre Manager, West Midlands Adult Cystic Fibrosis Centre, c/o Ward 26, Birmingham Heartlands Hospital, Bordesley Green East, and Birmingham, B9 5SS.

For full details of our GDPR policy please refer to our website [www.heartlandscf.org](http://www.heartlandscf.org). You may request details of personal information which we hold about you under the Data Protection Act 1998. If you would like a copy of the information held on you please write to: David Allbones, CF Centre Manager, West Midlands Adult Cystic Fibrosis Centre, c/o Ward 26, Birmingham Heartlands Hospital, Bordesley Green East, and Birmingham, B9 5SS.

If you believe that any information we are holding on you is incorrect or incomplete, please write to or email us as soon as possible, at the above address. We will promptly correct any information found to be incorrect. You can also stop any or all communication at any time by emailing, writing or phoning to: David Allbones, CF Centre Manager, West Midlands Adult Cystic Fibrosis Centre, c/o Ward 26, Birmingham Heartlands Hospital, Bordesley Green East, Birmingham, B9 5SS. [david.allbones@heartofengland.nhs.uk](mailto:david.allbones@heartofengland.nhs.uk) 0121 424 2261