



## **Sight for Wight Data Privacy Notice**

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One of the biggest changes to UK data privacy law comes into effect on 25 May 2018. Sight for Wight has reviewed and updated its policies and procedures to ensure adherence to the new General Data Protection Regulation (GDPR). This policy explains when and why we collect personal data, how we use it, the conditions under which we may disclose it to others and how we keep it secure. We will strive to ensure that all data held is:

- ❖ Fair & lawful
- ❖ Specific for its purpose
- ❖ Adequate, relevant and not excessive
- ❖ Accurate and up-to-date
- ❖ Not kept longer than needed
- ❖ Takes people's rights into account
- ❖ Kept safe & secure
- ❖ Is not transferred outside the European Economic Area (EEA)

### **1. Your personal data – what is it**

Personal data includes name, address and date of birth. It relates to a living individual, who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession. The processing of personal data is governed by the GDPR.



## **2. Who are we?**

Sight for Wight is an Independent Charity, No. 1149415 and Company Limited by Guarantee No. 6240404.

The core object of Sight for Wight is supporting Islanders affected by sight loss:

- ❖ Providing support & information
- ❖ Supporting services & activities
- ❖ Promoting well-being
- ❖ Promoting avoidable sight loss

The Chief Executive is nominated as the data protection lead and Data Controller for Sight for Wight.

## **3. How do we process your personal data?**

Sight for Wight complies with its obligations under the GDPR by keeping personal data up-to-date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure by ensuring that technical measures, including the introduction of a tailored database supported by sophisticated security measures, are in place to protect personal data.

### **We use your data for the following purposes:**

- ❖ To maintain current and historic records of trustees and guarantor members
- ❖ To manage our small team of employees and large team of volunteers
- ❖ To maintain records of members who receive any of our services, including but not limited to: quarterly newsletter, Talking News, audio library membership, any regular clubs, meetings or activities run or supported by Sight for Wight, home visiting, services run in partnership with other organisation to support those affected by sight loss, for example, Guide Dogs 'My Guide' programme, the enhancing reading programme run in conjunction with the Macular Society, low-vision drop-in days supported by various specialist equipment providers; plus one-off events, activities, meetings, opportunities or events for members
- ❖ To seek your views or comments in the services we provide

- ❖ To inform you of news, events and activities concerning Sight for Wight
- ❖ To maintain our own accounts and records
- ❖ To administer our contact records of partner organisations, supporters, sponsors, funders and potential funders
- ❖ To process orders that you have submitted
- ❖ To deal with entries into a competition
- ❖ To send you communications which you have requested and that may be of interest to you, these may include information about campaigns, appeals, other fundraising
- ❖ To acknowledge kind support, sponsorship, funding and donations received and to thank you for your generosity in supporting Sight for Wight

#### **4. What is the legal basis for processing your personal data?**

The GDPR requires that we identify one or more of the 6 legal bases for processing your personal data.

- ❖ **Legitimate interests**

Processing is carried out by Sight for Wight to fulfil its charitable objects. Processing relates only to those who have regular contact with us or with whom we are in contact in connection with delivering the charity's objects. Processing data is necessary for the delivery of our services and activities to members

- ❖ **Vital interests**

Sight for Wight processes some 'sensitive' data relating to eye conditions and general health of members, volunteers and employees where this information is necessary to protect someone's life

- ❖ **Contractual**

Sight for Wight processes some personal data when it is necessary for carrying out obligations under employment, social security or social protection law, or a collective agreement

- ❖ **Consent**

Explicit consent of the data subject will be sought so that we can keep you informed about Sight for Wight fundraising events and activities

- ❖ **Legal obligation**

The processing is necessary for Sight for Wight to comply with the law (not including contractual obligations)

## **5. Sharing your personal data**

Your personal data will be treated as strictly confidential and will not be shared with anyone else and in the unlikely event of a request, then only after obtaining your prior consent, or unless we are required to do so by law; for example, by a court order for the prevention of fraud or other crime.

We will never sell or rent your personal data to third parties or share your information for marketing purposes.

## **6. How long do we keep your personal data?**

We will review our retention periods for personal information on a regular basis. We are legally required to hold some types of information to fulfil our statutory obligations (for example the collection of Gift Aid). We keep data for as long as is necessary for the provision of services and activities for members. For Guarantor Members we are legally required to retain personal data in perpetuity.

## **7. Your rights and your personal data**

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- ❖ The right to request a copy of your personal data which Sight for Wight hold about you
- ❖ The right to request Sight for Wight correct any personal data if it is found to be inaccurate or out-of-date
- ❖ The right to request your personal data is erased where it is felt no longer necessary for Sight for Wight to retain such data
- ❖ The right to withdraw your consent to the processing at any time
- ❖ The right to request that the data controller provide the data subject with his/her personal data and, where possible, to transmit this data directly to another data controller, (known as the right to data portability), (where applicable). This only applies where the processing is based on consent or is necessary for the performance of a contract with the data subject and in either case the data controller processes the data by automated means
- ❖ The right, where there is a dispute in relation to the accuracy of processing of your personal data, to request a restriction is placed on further processing
- ❖ The right to object to the processing of personal data, (where applicable). This only applies where processing is based on legitimate interests (or the

performance of a task in the public interest/exercise of official authority);  
direct marketing and processing for the purposes of scientific/historical  
research and statistics

- ❖ The right to lodge a complaint with the Information Commissioners Office.

## **8. 16 or Under**

We are concerned to protect the privacy of children aged 16 or under. If you are aged 16 or under, please get your parent or legal guardian's permission before providing Sight for Wight your personal data.

## **9. Further Processing**

If we wish to use your personal data for a new purpose, not covered by this Data Protection Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

## **10 Contact Details**

To exercise all relevant rights, queries or complaints, in the first instance, please contact the Chief Executive, Miriam Tong by email [enquiries@iwsb.org.uk](mailto:enquiries@iwsb.org.uk) or by letter to Millbrooke House, 137 Carisbrooke Road, Newport, PO30 1DD.

You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

May 2018