

## Data protection policy

### **Scope**

This policy applies to the processing of personal data by the Retired Greyhound Trust, and also its subsidiary company, Retired Greyhound Events Limited (for the purposes of this policy, together, 'the RGT').

It covers the processing of personal data relating to the RGT's trustees, employees, and volunteers who work for the RGT. The policy also covers the RGT's supporters, donors and potential donors, visitors to our website who submit information, and those who wish to adopt greyhounds. In addition, it covers individuals within organisations that the RGT deals with, such as its suppliers, rescue organisations and authorities, and entities in the greyhound industry, as well as visitors to the RGT's head office and branches.

The types of information processed and primary purposes for such processing are set out below.

For individuals within other organisations, the types of information collected are usually job role and contact details. This data is processed to manage those relationships between the RGT and that organisation.

For supporters and donors, the kinds of information will be contact details plus certain financial information. This data is processed for fundraising, to keep supporters and donors up to date with our work and to further the charitable aims of the RGT.

When people wish to adopt a greyhound, more information is collected, relating to the household where it is proposed that the greyhound will live. This data is processed for the purposes of animal welfare and to deal with any queries relating to the adoption or proposed adoption.

For staff, volunteers and trustees, in addition to contact details, information may also include emergency contacts, CV, appraisal records, payroll information, sickness / absence records, bank account details, details of any driving licence penalties and criminal offences, any conflicts or potential conflicts of interest and other information required for staff and volunteer administration, for the management of the charity and to fulfil the RGT's obligations as an employer and as a charity.

The RGT also processes personal data for the purposes of security.

## **Purpose of the policy**

The Data Protection Act has two purposes:

1. To regulate how information is used by 'data controllers' who obtain, hold and process personal data on living individuals
2. To provide certain rights to living individuals whose data is held

The Act details eight data protection principles which outline:

1. Guidance on the 'life cycle' of personal data, including origination, processing, amending, disclosing and destroying data
2. The reason which data is gathered and held by an organisation
3. The personal rights of the data subjects

The Act applies to anyone who collects and holds data about individuals, such as the RGT. This policy describes how the RGT complies with its obligations under the Data Protection Act.

## **The responsibilities of the Retired Greyhound Trust**

Employees and volunteers of the RGT are expected to:

1. Have an understanding of Data Protection principles
2. Review and have an understanding of the RGT's data protection policy
3. Understand the acquisition, storing, use and destruction of personal data
4. Understand the rights of individuals whose data the RGT stores
5. Understand what data is sensitive and the appropriate way to store such data

The RGT will provide training and guidance to its staff and volunteers on the interpretation of and practical compliance with this policy.

In the case of staff, failure to comply with this policy could constitute gross misconduct.

## **Data Protection Principles**

The Data Protection Principles are as follows. Personal data must be:

1. processed fairly and lawfully;
2. obtained only for one or more specified purposes, and not further processed in a way which is incompatible with that purpose;
3. adequate, relevant and not excessive for the purpose(s);

4. accurate and, where necessary, up to date;
5. not kept for longer than is necessary for the purpose(s);
6. processed in accordance with the rights of data subjects;
7. kept secure; and
8. not transferred outside the EEA to countries without adequate protection for personal data.

### **How the RGT applies these policies**

The RGT complies with the data protection principles. In order to process personal data fairly and lawfully, in addition to the information provided about the processing in this policy, the RGT ensures that at least one of the following conditions is met before processing any personal data:

1. The individual has consented to the RGT's processing of their information
2. The processing is necessary for the performance of a contract with the individual
3. The processing is required under a legal obligation (other than one imposed by a contract)
4. The processing is necessary to protect vital interests of the individual
5. The processing is necessary for administration of justice or
6. The processing is necessary for the legitimate interests of the RGT or a third party to whom the data are disclosed, and that such processing is not unwarranted because of the prejudicial effects on the rights and freedoms of the individual who is the subject of the data.

### **Special considerations under the Act**

Under the Act, one of a set of additional conditions must be met for 'sensitive personal data'. This includes information about:

1. Racial or ethnic origin
2. Political opinions
3. Religious and other beliefs
4. Trade union membership
5. Physical or mental health condition
6. Sex life
7. Criminal proceedings or convictions.

While the RGT would not generally process this type of 'sensitive personal data', if required the RGT will ensure that one of the following additional conditions is met before processing sensitive personal data:

1. The individual has explicitly consented to the processing
2. The RGT is required by law to process the information for employment purposes
3. The RGT needs to process the information in order to protect the vital interests of the individual or another person
4. The processing is necessary to deal with the administration of justice, or legal proceedings, for obtaining legal advice or otherwise establishing, exercising or defending legal rights or
5. The individual has deliberately made the information public

### **Storing of personal data**

The RGT will ensure:

1. Personal data is securely stored at branch and national levels
2. Personal data will only be processed by those personnel who have a need to know the same
3. Robust passwords are used when accessing digital personal data
4. Wherever possible, encryption is utilised when transporting data
5. When destroyed, personal details are properly and confidentially destroyed, such as by shredding or secure destruction of computer equipment
6. No personal information will be provided to third parties unless the RGT representative is 100% confident that the data is solely that of the enquirer or that there are clear legal grounds for the disclosure of the information
7. In the event of any query relating to the processing of personal data or if there is a possibility that personal data could have been lost or accidentally destroyed or disclosed, the RGT Data Protection Officer should be contacted immediately.

### **Disclosures and transfers of personal data**

The RGT will not share any data with third parties outside of the UK. Data may be shared, where necessary, with professional and trusted suppliers, in particular for the aid of posted or digital communication or in other appropriate circumstances, such as accountants, auditors, IT and merchandise suppliers. The RGT will put in place contracts with such third party suppliers governing how they take care of the personal data on behalf of the RGT.

Should an individual wish not to be included in marketing communications, the RGT will mark their record appropriately to ensure marketing communications are not released from the RGT database for any reason.

Personal data may also in some circumstances be shared by the RGT with third party organisations such as bona fide animal rehoming organisations and authorities such as local authority dog wardens for the purpose of pet reunification

The RGT does not transfer personal data outside the EEA to countries that do not provide adequate protection for personal data.

### **Destruction of personal data**

Under the Act, personal data must not be held longer than necessary. When the data has been marked as 'no longer necessary' all care and appropriate measures should be taken to ensure that it cannot be reconstructed by any third parties.

### **Individuals' rights of access**

The RGT will ensure that individuals can access their personal data held on file, while ensuring the needs to protect other individual's privacy rights.

Individuals have a right to ask for a copy of information that RGT hold about themselves, for which the RGT will charge a £10.00 fee to cover administrative costs and to process each request. If there are any inaccuracies in the individual's information the RGT will correct it upon instruction.

### **Please send any enquiries to:**

RGT Data Protection Officer  
2<sup>nd</sup> Floor, Park House  
1-4 Park Terrace  
Worcester Park  
Surrey  
KT4 7JZ

### **Version 1 – April 2013**

This policy will be posted on the RGT website. The policy is subject to review and may be amended at any time. Any changes will be posted on the RGT website.