



## **RHL General Data Protection Regulation of 2023 (GDPR) Policy and Procedures**

RHL GDPR Policy July 2023 – Review July 2024

### **Introduction**

The General Data Protection Regulation (GDPR) will apply in the UK from 25 May 2018, replacing the Data Protection Act 1998. GDPR applies to personal data. Put simply, personal data is any information which relates to a living person.

In relation to Rushmoor Healthy Living (RHL), most data will be an individual's name, personal address, email address and contact telephone number.

This Data Protection Policy sets out RHL's commitment to protecting personal data and how that commitment is implemented regarding the collection, processing and use of personal data, in line with meeting requirements of, including the legal obligations as laid down by, the GDPR. This applies to personal data held on paper and held electronically.

### **RHL is committed to ensuring that personal data shall be:**

- collected, processed and used lawfully, fairly and in a transparent manner in relation to individuals
- collected, processed and used for specified, explicit and legitimate purposes to meet the business operational needs and fulfil its legal requirements, and not further processed in a manner that is incompatible with those purposes
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed
- accurate and, where necessary, kept up to date - with every reasonable step 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
- established with appropriate retention periods
- processed and stored in a manner that ensures appropriate security of the

personal data, with defined organisational, physical, procedural and technical security measures implemented and maintained to protect against unauthorised disclosure, unauthorised modification, unauthorised unavailability and destruction, and unlawful processing – and against accidental loss, destruction or damage

**RHL is also committed to:**

- ensuring that data subjects' rights can be appropriately exercised
- ensuring that a nominated RHL Data Protection Officer is responsible for data protection compliance and provides a point of contact for all data protection issues. This shall be the RHL CEO
- ensuring that queries about data protection, internal and external to RHL, are dealt with effectively and promptly

**Summary of how RHL uses and shares your Data**

- RHL uses your personal data to manage and administer your activity attendance at our classes, socials, projects or events. This will include whether you have paid for our classes and what activities you have / plan to have attended
- RHL will use your contact details to keep you informed of RHL news and our activities
- Personal data may have to be shared with government authorities and/or law enforcement officials if mandated by law or if required for the legal protection of our legitimate interests in compliance with applicable laws

**What does this Policy and Notice cover?**

This policy and notice describes:

- what personal data RHL collects and makes use of in relation to its clients
- what information RHL receives from third parties
- how RHL uses your personal data, and what the legal basis is for this use
- the rights you have
- how you get in touch with RHL
- how long RHL will retain your personal data
- the security in place to protect your personal data

What Information does RHL collect and use?

- RHL collects and processes personal data from you when you contact RHL to take part in our activities, classes, projects and other events

- RHL also collects and processes personal data relating to people who carry out our activities, classes, projects and events such as exercise tutors to enable them to carry out the classes safely and securely
- The personal data which you supply to RHL may be used in several ways as shown below (the data types collected and processed are shown in brackets):

On paper, to complete/complete action on the:

- o Standing Order or Direct Debit Mandate Form (name, bank account details, address)
- o letter to Confirm Services (name, email address, address, telephone number)

In electronic form, using the information supplied on paper to update the:

- o invoices (name, address, details of work)
- o accounts (name, date, amount)
- o Bank Statement (name, date, amount)

Please note that when your personal data is collected by RHL, you must specifically indicate your consent for RHL collecting, holding and processing your personal data. This is done via paper or via email.

You will also be asked to confirm you are happy for RHL to keep in contact with you.

**What Information does RHL receive from Third Parties?**

Sometimes, we may get referrals from health services or General Practitioners to contact you regarding our specialist classes. We will ensure you have given the third party express consent allowing us to make contact before we approach you.

**How does RHL use this Personal Data, and What is the Legal Basis for this use?**

RHL processes personal data for the following purposes:

- as required by RHL to conduct its business and pursue its legitimate business interests
- for purposes which are required by law:
  - o RHL maintains accounting records in order to meet specific legal requirements

- o RHL may respond to requests by government or law enforcement authorities conducting an investigation

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

You have the right to ask RHL for a copy of your personal data, to correct, delete or restrict (stop any active) processing of your personal data. You can also request a specific set or piece of information, or information about how your data has been used and shared. (Note that organisations are no longer able to charge a fee for this, and the information must be provided within 30 days.)

In addition, you can object to the processing of your personal data in some circumstances (in particular, where RHL does not have to process the data to meet a contractual or other legal requirement).

Rights may be limited, for example if fulfilling your request would reveal personal data about another person, or if you ask RHL to delete information which we are required by law to keep or have compelling legitimate interests in keeping.

To exercise any of these rights, you can get in touch with RHL. If you have unresolved concerns, you have the right to complain to the Information Commissioner's Office (the UK's independent authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals) – <https://ico.org.uk>.

### **How do I get in touch with RHL?**

RHL hopes that it can satisfy queries you may have about the way the RHL processes your data. If you have any concerns about how RHL processes your data, you can get in touch by emailing [gdpr@rhl.org.uk](mailto:gdpr@rhl.org.uk)

### **How long will RHL retain my Data?**

RHL processes the majority of your data for as long as you are a customer and for 6 years after this (within accounts). For other information, it will be appropriate only to keep data for a shorter period of time. For example, RHL will not need to keep bank details of former employees or contractors.

What Security must be in place to Protect my Personal Data?

### Paper Documents

Accounts, staff, contractor and client details are kept in a file in a locked cupboard.

Note: when paper documents are no longer required they must be destroyed by shredding (not just ripping up and putting them in the bin).

### Electronic Documents

Customer details, accounts, staff, supplier and contractors: data stored on computer, portable hard drive and a laptop accessible only to RHL. These devices are connected to the Internet, and not accessible to others. **It is mandatory that these laptops MUST be user id and password protected. In some cases files will be encrypted.**

It should be noted that for many websites, a Cookie Policy sets out how a website uses cookies. However, this does not apply for RHL as its website does not use cookies.

Hopefully no data breaches will occur with the level of security in place: please note the following.

A data breach is, put simply, a security incident that has affected the confidentiality, integrity or availability of personal data. There will be a personal data breach whenever:

- any personal data is lost, destroyed, corrupted or disclosed
- if someone accesses the data or passes it on without proper authorisation
- if the data is made unavailable and this unavailability has a significant negative effect on individuals

There may be a number of ways this can happen, such as a lost device, a file sent to the wrong recipient or a hack. It need not be technical; a lost hard copy file will also be a data breach.

In the case of a data breach RHL will act quickly, to inform those individuals whose data may have been disclosed and inform the ICO.

### **Summary**

Under GDPR, the key requirements for RHL are:

- a) a maintained up-to-date register showing what personal data RHL collects, holds and uses (on paper and electronically)
- b) a Data Protection (Privacy) Policy and Notice (this document)

- c) relevant procedures in place related to clients, staff, contractors and suppliers who wish to exercise their rights, e.g. to ask for a copy of their personal data, to correct, delete or restrict (stop any active) processing of their personal data
  - d) enhanced security for paper and electronic personal data records: locked containers for paper records – and when no longer needed destruction by shredding; and user id and password for any devices holding electronic records
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### **Staff Procedure**

Any request for information must be acknowledged (within 7 days of receipt), recorded (in “Information Requests register”) and passed to the CEO who will assess the request and action according to RHL GDPR Policy and National Law.

The CEO will respond within 28 days no matter what the outcome is. If the persons requesting the information is not satisfied, it will be treated as a complain and referred to the Board of Trustees in line with RHL’s Complaints Procedure. Their decision is final but information will be given on how to contact the Information Commissioners Office.

Each enquiry will be assessed for fairness and legality ensure RHL keep to their GDPR Policy and National Law.

All actions will be recorded in the “Information Requests Register”.

### **RHL:**

GDPR Lead: Jim Ruddy, CEO RHL  
Contact No: 01252957430  
Email: [jim.ruddy@rhl.org.uk](mailto:jim.ruddy@rhl.org.uk)  
Website: [www.rhl.org.uk](http://www.rhl.org.uk)

Policy Sign off:

A handwritten signature in black ink on a light grey rectangular background. The signature is cursive and appears to read 'Jim Ruddy'.

Jim Ruddy  
CEO  
RHL  
July 2023