



Significant Seams Confidentiality and Privacy Policy

Replaces November 2014 Data Protection Policy & November 2014 Confidentiality Policy

Adopted by Board – March 2021

Elements Pending Revision/Adoption in accordance with the implications of Brexit

Significant Seams treats people's personal data with utmost respect.

The GDPR is a law that imposes additional obligations on organisations and gives individual's extra rights around how their data is used.

- UK adequacy from June 2021 ensures unrestricted personal data flow between EU and UK for four years (till June 2025),
- The general data protection regime in UK data law has been changed to accommodate the disappearance of the EU GDPR's domestic applicability, including new domestic data privacy laws such as the new **UK-GDPR and an updated Data Protection Act**,
- After January 1, 2021, the EU's GDPR will still apply inside the EU for UK websites and companies that process personal data from inside the EU.

The following document identifies what personal information we hold and why, and what your rights are.

Who

Significant Seams holds personal details of former and current workers, directors, volunteers, and course and project participants.

Why

We hold this data to uphold our statutory duties, provide appropriate reports to funders and clients, and most importantly for us, to ensure appropriate duty of care to all who engage with us.

We also hold limited data for the purposes of supporting people to remain aware and active in our community and future activities.

We hold data only when it meets one or more of these reasons:

- To serve your group's "[legitimate interests](#)", or
- Because you have [explicit consent](#) from the person whose data it is, or
- To [fulfil a contract](#) with the person whose data it is, or
- To meet a [legal obligation](#), or
- To [protect someone's life](#), or
- To perform a [public task](#)

<https://bit.ly/SigSeamsPrivacy>

What

Data held on participants includes contact details, and what if any, activities they have participated in.

A DBS check is obtained and held for directors, workers and volunteers, and stored in accordance with this policy. Evidence of insurance is held for all of our participant facing workers.

For governance purposes, a range of personal data is held on current and former directors for an appropriate period of time.

For How Long

As a micro organisation we may retain details unless asked or updated by the person in question to delete them, as long as one of the above reasons remains relevant.

Where

All personal details are stored in password protected documents or encrypted software, including those of third party providers like google drive, mailchimp, and eventbrite.

How

A third party provider (currently mailchimp) is used for maintaining our mailing lists and a privacy notice is linked to every email. Individuals can directly manage their inclusion in this list via an unsubscribe button, and can manage preferences on how their data may be used at point of subscription.

All workers have agreed confidentiality in legally binding documents.

Volunteers have strictly limited access to sensitive data. Any access is supported by a legally binding confidentiality agreement.

A limited number of workers and/or volunteers are necessarily privy to a range of information about the organization deemed sensitive – about our finances, business plans, board discussions, volunteers, customers and clients. These must be treated with due confidence – and a confidentiality agreement marks this agreement between both parties. Breach of this confidentiality agreement is considered a serious offense.

Data protection coordinator

To ensure the implementation of this policy Significant Seams has designated the Chief Executive as the data protection coordinator. All enquiries relating to the holding of personal data should be referred to the Chief Executive.