



## **Coodal Charity Data Protection and UK GDPR Policy**

### **1. Introduction**

Coodal is committed to protecting the privacy and security of the personal data of its supporters, beneficiaries, employees, volunteers, and all other individuals with whom it interacts. This Data Protection and UK GDPR Policy outlines our approach to managing and protecting personal data in compliance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

### **2. Purpose of the Policy**

This policy aims to ensure that Coodal complies with all relevant data protection laws, including UK GDPR, and sets out how we collect, store, use, and share personal data responsibly. This will ensure transparency and accountability in our data processing activities.

### **3. Definitions**

- **Personal Data:** Any information relating to an identified or identifiable natural person (data subject), such as name, address, email, or identification number.
- **Special Categories of Personal Data:** Personal data that is more sensitive, such as health information, racial or ethnic data, religious beliefs, etc.
- **Processing:** Any operation performed on personal data, including collection, storage, use, sharing, and deletion.
- **Data Subject:** The individual whose personal data is being processed.

## 4. Data Protection Principles

Coodal is committed to processing personal data by the following principles:

- **Lawfulness, fairness, and transparency:** Personal data will be processed lawfully, fairly, and transparently in relation to the data subject.
- **Purpose limitation:** Personal data will only be collected for specified, legitimate purposes and not processed further in a manner that is incompatible with those purposes.
- **Data minimisation:** Personal data will be adequate, relevant, and limited to what is necessary for the purposes for which it is processed.
- **Accuracy:** Personal data will be accurate and kept up to date. Inaccurate data will be corrected or deleted without delay.
- **Storage limitation:** Personal data will be kept in a form which permits identification of data subjects only for as long as necessary for the purposes for which it was collected.
- **Integrity and confidentiality:** Personal data will be processed in a manner that ensures appropriate security, including protection against unauthorised or unlawful processing and accidental loss, destruction, or damage.

## 5. Legal Basis for Processing Personal Data

Coodal processes personal data only when one or more of the following legal bases under the UK GDPR apply:

- **Consent:** The data subject has given clear consent for their data to be processed for a specific purpose.
- **Contractual necessity:** Processing is necessary for the performance of a contract with the data subject.
- **Legal obligation:** Processing is necessary for compliance with a legal obligation.
- **Legitimate interests:** Processing is necessary for legitimate interests pursued by Coodal or a third party, provided that the interests are not overridden by the data subject's rights and freedoms.

## 6. Data Subject Rights

Coodal recognises the following rights of individuals under UK GDPR:

- **Right to access:** Data subjects have the right to request a copy of their data.
- **Right to rectification:** Data subjects can request that inaccurate or incomplete personal data be corrected or updated.
- **Right to erasure:** Data subjects can request the deletion of their data under certain conditions.
- **Right to restriction of processing:** Data subjects can request the restriction of processing of their data under certain conditions.
- **Right to data portability:** Data subjects can request that their data be transferred to another data controller in a structured, commonly used, and machine-readable format.
- **Right to object:** Data subjects can object to the processing of their personal data under certain circumstances, including direct marketing.

- **Rights related to automated decision-making and profiling:** Data subjects have the right not to be subject to automated decisions, including profiling, that significantly affect them.

## **7. How We Collect Personal Data**

Coodal collects personal data through:

- Donations, event registrations, and memberships.
- Volunteer sign-ups and recruitment processes.
- Communications with supporters, beneficiaries, and stakeholders.
- Surveys, newsletters, and marketing campaigns.
- Staff and volunteer records.

## **8. Data Security Measures**

Coodal takes appropriate technical and organisational measures to protect personal data from unauthorised access, alteration, disclosure, or destruction. These measures include:

- Use of secure systems for storing and transmitting personal data.
- Regular staff training on data protection and security practices.
- Implementation of access controls to restrict access to personal data.
- Regular audits and reviews of data protection practices.

## **9. Sharing and Disclosing Personal Data**

Coodal will only share personal data with third parties when it is necessary and lawful to do so. This may include sharing data with:

- Service providers who process data on behalf of Coodal (e.g., payment processors, email service providers).
- Authorities or other third parties when required by law or to prevent fraud or illegal activity.

We will never sell, rent, or lease personal data to third parties.

## **10. Retention of Personal Data**

Coodal will retain personal data for no longer than necessary to fulfil the purposes for which it was collected, and under legal or regulatory retention requirements. Once the data is no longer required, it will be securely destroyed.

## **11. Data Breaches**

In the event of a data breach, Coodal will:

- Notify the Information Commissioner's Office (ICO) within 72 hours, if required.
- Notify the affected data subjects if the breach is likely to result in a high risk to their rights and freedoms.
- Take appropriate measures to contain and mitigate the breach.

## **12. Monitoring and Compliance**

Coodal's Data Protection Officer (DPO) is responsible for ensuring compliance with this policy and overseeing data protection activities. Regular audits and reviews of our data processing practices will be conducted to ensure ongoing compliance with UK GDPR.

## **13. Changes to the Policy**

Coodal may update this policy from time to time. Any changes will be communicated to individuals whose data we process, and the updated policy will be available on our website.

## **14. Contact Information**

If you have any questions or concerns about how Coodal processes personal data, or if you wish to exercise your data protection rights, please contact:

### **Data Protection Officer (DPO)**

Coodal Charity

[Insert Address]

[Insert Email]

[Insert Phone Number]

This policy is effective as of [Insert Date].

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This policy outlines how Coodal handles data protection and ensures compliance with UK GDPR.

S.Shanmugadasan

15/3/2025