

Data Protection Policy for FRAMFRIDGE CIC

1. Policy Statement

FRAMFRIDGE CIC is committed to protecting the privacy and security of personal data. We recognise our responsibilities under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 to collect, store, and handle data fairly, lawfully, and transparently.

This policy explains how we collect, use, store, and protect personal data, including data of volunteers, service users, donors, and partners.

2. Purpose

The purpose of this policy is to:

- Ensure compliance with the UK GDPR and Data Protection Act 2018.
 - Inform individuals how their data is used.
 - Provide procedures for managing personal data.
 - Protect the rights of individuals whose data we process.
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3. Scope

This policy applies to:

- All volunteers and staff of FRAMFRIDGE CIC
 - All personal data processed in relation to the operation of the Community Fridge.
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4. Data We Collect

We may collect and process the following types of personal data:

Volunteers

- Full name and contact details
- Emergency contact information
- Availability and rota preferences
- DBS certificate reference (if applicable)
- Relevant medical information (if voluntarily provided)

Service Users (usually minimal)

- Full name and contact details
- Anonymised data (e.g. number of users, general demographics)
- Feedback forms (only with explicit consent)

Donors and Partners

- Contact details
 - Organisation name
 - Communications history
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5. Lawful Basis for Processing

We only process personal data where we have a lawful basis to do so. These include:

- **Consent:** Individuals have given clear consent for us to process their personal data.
 - **Legal obligation:** For example, safeguarding or health & safety requirements.
 - **Legitimate interests:** When it is necessary for the operation and improvement of the Community Fridge and does not override the rights of the individual.
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6. How We Use Personal Data

We use personal data to:

- Communicate with volunteers and coordinate rotas.
- Comply with health, safety, and safeguarding regulations.
- Record feedback and improve our services.
- Maintain contact with donors and supporters.

We **do not** sell or share personal data with third parties for marketing purposes.

7. Data Storage and Security

We store data securely, using password-protected documents or systems. Paper records (if used) are kept in locked storage accessible only to authorised personnel.

We regularly review our data storage practices to ensure security and compliance.

8. Data Retention

We retain data only for as long as necessary:

- Volunteer records: up to 1 year after leaving (unless safeguarding or legal issues require longer).
- Donor/supporter contact details: retained while the relationship is active.
- Anonymised service user data: retained for statistical and reporting purposes only.

Records are securely deleted or destroyed when no longer required.

9. Individual Rights

Under UK GDPR, individuals have the following rights:

- Right to be informed
- Right of access (Subject Access Request)
- Right to rectification
- Right to erasure ("right to be forgotten")
- Right to restrict processing
- Right to data portability
- Right to object

Requests should be directed to the Data Protection Lead (see Section 11).

10. Data Breaches

In the event of a personal data breach, we will:

- Take immediate action to contain and assess the breach.
 - Notify affected individuals where appropriate.
 - Report serious breaches to the Information Commissioner's Office (ICO) within 72 hours.
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11. Data Protection Contact

For all data protection matters, including access requests or complaints, please contact:

Data Protection Lead: Ruth Ditchburn & Lauren Ramsay

Email: info@framfridge.co.uk

Phone: 07495 225293

Address: 1 Black Barn Cottages, Framlingham, IP13 9PU

12. Review of Policy

This policy will be reviewed annually or after significant changes in data protection law or the structure of the Community Fridge.

Last reviewed: 01/10/2025

Next review due: 01/10/2026

Approved by: Ruth Ditchburn & Lauren Ramsay