

Cambridge Sustainable Food CIC

Data Protection Policy

1. Introduction

Cambridge Sustainable Food CIC needs to collect and use information about individuals whom it comes into contact with - in order to carry on its work.

This personal information must be collected and dealt with appropriately, whether it is collected on paper, stored in a computer database, or recorded on other material.

To this end, Cambridge Sustainable Food CIC will adhere to the 2018 data protection act and UK. GDPR. We will abide by its following principles, that data should be:

- a) processed lawfully, fairly and in a transparent manner in relation to individuals;
- b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d) accurate and, where necessary, kept up to date; every reasonable step must be 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;
- e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

Data will not be transferred to a country outside the European Economic Area, unless that country has equivalent levels of protection for personal data.

2. Data Controller

Cambridge Sustainable Food CIC is the "Data Controller" under the Act. It has determined that it will only hold and use personal information for the purposes of:

- 1) establishing or maintaining involvement with CSF or support for it
- 2) providing or administering CSF activities

3) recruitment and employment of staff Cambridge Sustainable Food CIC, as a not-for-profit organisation, is thus exempt from having to notify the Information Commissioner's Office about data it holds, and from having to register with them.

3. Disclosure

Disclosures of personal data held by CSF CIC are restricted to those third parties that are necessary for the purposes in (2), other than those made with the informed consent of the data subject. Individuals will be made aware of how and with whom their information will be shared through our privacy notice and privacy policy.

4. Data collection

Cambridge Sustainable Food CIC will ensure that personal data is only collected for the purposes in (2) and will observe fully conditions regarding the fair collection and use of information. When collecting data about individuals, CSF CIC will ensure that the individuals:

- 1) clearly understand why the information is needed
- 2) understand what it will be used for and what the consequences are should they decide not to give consent to processing
- 3) as far as reasonably possible, grant explicit consent, either written or verbal for data to be processed
- 4) are, as far as reasonably practicable, competent enough to give consent and have given so freely without any duress

5. Data Storage

Information and records will be stored securely and will only be accessible to authorised staff and volunteers. Personal data will be stored in password protected cloud files ie: Google drive, Google calendar and other cloud files authorised by the data controller. Permission to view/ edit will be restricted by the data controller on a need to know basis. No personal data will be held on portable storage devices including but not restricted to laptops, phones or tablets. Employees, directors and authorised volunteers should log into password protected sites and ensure they log out at the end of a session.

Information will be stored for only as long as it is needed and will then be deleted: It will not be kept after the relationship between CSF and the data subject ends, unless (and for so long as) it is necessary to do so for the purposes in (2). It is CSF's responsibility to ensure all personal data is non-recoverable from any computer system previously used within the organisation, which has been passed on/sold to a third party.

6. Data access and accuracy

All individuals have the right to access information CSF holds about them. CSF will, through appropriate management and procedures:

- 1) ensure people, about whom information is held, can:
 - a) access their personal information
 - b) correct, rectify, block or erase any incorrect information about them

- 2) respond to these requests promptly and courteously, and within the specified 40 day period
- 3) ensure the quality of information used and take reasonable steps to keep it up to date by asking data subjects whether there have been any changes
- 4) take appropriate technical and organisational security measures to safeguard personal information

7. Operation

Cambridge Sustainable Food CIC will ensure that:

- 1) it has a Data Protection Officer with specific responsibility for ensuring compliance with this Data Protection Policy and related procedures.
- 2) everyone processing personal information understands that they are responsible for following good data protection practice
- 3) everyone processing personal information is appropriately trained to do so and supervised
- 4) it regularly reviews the ways it holds, manages and uses personal information
- 5) all staff are aware that a breach of the rules and procedures identified in this policy may lead to disciplinary action being taken against them

This policy will be updated as necessary to :


- 1) reflect best practice
- 2) ensure compliance with any amendments to the Data Protection Act 2018 (GDPR)
- 3) reflect relevant changes in CSF CIC's operations.
- 4) reflect any changes in personal data collected and how it is processed

In case of any queries or questions in relation to this policy please contact the CSF Data Protection Officer: Sam Dyer sam@cambridgesustainablefood.org

Policy dated 23/05/2018. Revised 15/09/2019. Revised 28/09/2021

It will be reviewed annually

Signed on behalf of directors:



Name: Ann Mitchell

Date: 29/09/21