

# **PHILIPS ELECTRONICS PENSIONERS BENEVOLENT ASSOCIATION**

## **PRIVACY POLICY – Reviewed Nov 2021**

*From time to time, the trustees will review and if necessary update this policy. The latest version will always be available on the PBF website.*

*In the following, The Benevolent Fund for Philips UK Pensioners is referred to by its abbreviation PBF.*

### **Introduction**

PBF's Privacy Policy is organised under seven GDPR principles.

#### **1. Lawfulness, fairness, and transparency**

As a registered charity aiming to provide financial assistance to its applicants, it is necessary for PBF to keep records of those applicants and those members who donate to the charity, including personal data such as names and contact details. On applying to PBF, each applicant completes an application form to provide the personal data necessary for PBF to assess the applicant's need. This is received by the Trustees and is treated as strictly confidential.

On sending a donation each donor may supply information for the purposes of obtaining an acknowledgement and/or to allow PBF to reclaim Gift Aid.

PBF's Trustees will provide an applicant or donor with a full account of the personal information we hold for them, should they require it.

#### **2. Purpose limitation**

Applicants' personal data is stored and maintained solely to meet the published aims and objectives of PBF. It is not shared with any other organisation or company without the express permission on the Applicant.

Donors' personal data is stored and maintained solely to meet the published aims and objectives of PBF. It is not shared with any other organisation or company.

#### **3. Data minimisation**

The applicant information PBF holds is at a level necessary and sufficient for PBF to address the needs of the client. Any specific item of personal data will be removed at a client's request.

The donor information PBF holds is at a level necessary for PBF to submit a claim to HMRC for Gift Aid payments only. Any specific item of personal data will be removed at a donor's request.

#### **4. Accuracy**

Data is created from information provided by applicant and donors when they make an application or donation to PBF. Subsequent updates to the data, such as a change to a postal or email address, will be made at their request.

#### **5. Storage limitation**

When an applicant's case is complete, all records apart from those kept by the Trustees are securely destroyed. Hard copy application forms are scanned and stored electronically similarly to applications that are received electronically. Hard copy application forms are securely destroyed. The Trustees then hold the electronic copy for up to 7 years, after which the record is securely deleted.

The Trustees also keep a summarised list of all applicants and if successful records the amount given and if they have applied to any other charity.

The Trustees also keep a summarised list of all donations.

## **6. Integrity and confidentiality**

PBF's Trustees control and maintain PBF's applicant records, and access to the data is not made available to any other person.

The data is kept securely on the personal electronic devices of each trustee, in password-protected form which is only available to the trustee. It is not available in printed form. Whenever data is transferred, it is encrypted.

## **7. Accountability**

The scale and nature of PBF's operation means that there is no statutory requirement for a Data Protection Officer to be appointed. The person responsible for ensuring that PBF discharges its obligations under the GDPR is the Chairman of the PBF's Trustees.