

# GDPR – Policy – WasteAid UK

Date: 28/02/18

This audit is based on the steps available at <https://ico.org.uk/media/for-organisations/documents/1624219/preparing-for-the-gdpr-12-steps.pdf>

## 1. Awareness

Key person will always be updated about changes to the GDPR. At the time of writing of this policy this includes:

- Mike Webster – CEO
- Zoë Lenkiewicz – Head of communications
- David Leeke – IT Manager

They have been made aware of the GDPR regulations, seen ICO guidance and seen this document

## 2. What personal data do we hold at the moment?

We take sign ups and have data held for us on our behalf by

- Mailchimp - newsletter
- Justgiving – one off and regular donations
- Stripe payments – one off and regular donations

If we sign up to any new similar online systems we will ensure that these are added

## 3. Privacy notices

We have reviewed our privacy notices where they are not dealt with by a third party and will ensure that all sign ups are always explicit for each and every scheme and not shared across them

## 4. Individual's rights

All individuals can:

- Request to have their data deleted via the third parties we deal with
- Request to have it provided in a usable format (excel spreadsheet)

## 5. Subject Access requests

We will deal with requests within 1 month

## 6. Identify the lawful basis for processing personal data

We will ensure in every case and for each use of data consent is explicitly given.

## 7. How do we obtain consent?

In all cases we explicitly ask for it – usually as an online tickbox.

## **8. Dealing with children**

We do not currently hold any data on children. If we do so we will review our procedures to ensure that this is done legally and with the required consent of guardians or parents.

## **9. Data Breaches**

We hold all of our data with third parties and none on our own servers.

## **10. Data Protection by Design and Data Protection Impact Assessments**

A DPIA is required in situations where data processing is likely to result in

high risk to individuals, for example:

- where a new technology is being deployed;
- where a profiling operation is likely to significantly affect individuals; or
- where there is processing on a large scale of the special categories of data.

We do not consider that this is applicable to us but if we deploy new technology or engage in profiling we will undertake a DPIA.

## **11. Data Protection Officers**

You must designate a DPO if you are:

- a public authority (except for courts acting in their judicial capacity);
- an organisation that carries out the regular and systematic monitoring of individuals on a large scale; or
- an organisation that carries out the large-scale processing of special categories of data, such as health records, or information about criminal convictions.

This does not include WAUK hence we will not have a specific DPO. However, the Chief Executive Officer will be the point of reference for any data queries.

Signed



Mike Webster, CEO WasteAid UK

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