

Data protection policy and privacy notice

Kagyu Dechen Buddhism

Approved by: Kagyu Dechen Buddhism Trustees **Amended:** 21st March 2021

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1. Aims

Kagyü Dechen Buddhism aims to ensure that all data collected about sangha members, newcomers and online ticket purchasers is collected, stored and processed in accordance with the Data Protection Act 1998.

This policy applies to all data, regardless of whether it is in paper or electronic format.

2. Legislation and guidance

This policy meets the requirements of the [Data Protection Act 1998](#), and is based on [guidance published by the Information Commissioner's Office](#).

It also takes into account the expected provisions of the [UK General Data Protection Regulation](#), which is legislation that came into force following the exit of the UK from the EU.

3. Definitions

Term	Definition
Sangha members	Individuals who have taken refuge and a part of the Kagyü Dechen Buddhism Community
Newcomers	Individuals who attend introductory meditation sessions and classes who have requested to be kept informed of events taking place.
Online Ticket Purchasers	Individuals who buy an online ticket for one-off events.
Volunteer	As defined in Volunteer Policy
Personal data	Data from which a person can be identified, including data that, when combined with other readily available information, leads to a person being identified
Sensitive personal data	Data such as: <ul style="list-style-type: none">• Contact details• Racial or ethnic origin• Political opinions• Religious beliefs, or beliefs of a similar nature• Where a person is a member of a trade union• Physical and mental health• Sexual orientation• Whether a person has committed, or is alleged to have committed, an offence• Criminal convictions
Processing	Obtaining, recording or holding data

Data subject	The person whose personal data is held or processed
Data controller	A person or organisation that determines the purposes for which, and the manner in which, personal data is processed
Data processor	A person who processes the data on behalf of the data controller
Data Breach	A personal data breach is a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data .

4. The data controller

Kagyu Dechen Buddhism processes personal information relating to sangha members, newcomers and online ticket purchasers and, therefore, is a data controller. Kagyu Dechen Buddhism delegates the responsibility of data controller to Simon Rowan

Kagyu Dechen Buddhism is not registered as a data controller with the Information Commissioner's Office as it is exempt under the ["not-for-profit" organisation](#) guidelines but will review this decision annually.

5. Data protection principles

The Data Protection Act 1998 is based on the following data protection principles, or rules for good data handling:

- Data shall be processed fairly and lawfully
- Personal data shall be obtained only for one or more specified and lawful purposes
- Personal data shall be relevant and not excessive in relation to the purpose(s) for which it is processed
- Personal data shall be accurate and, where necessary, kept up to date
- Personal data shall not be kept for longer than is necessary for the purpose(s) for which it is processed
- Personal data shall be processed in accordance with the rights of data subjects under the Data Protection Act 1998
- Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data, and against accidental loss or destruction of, or damage to, personal data
- Personal data shall not be transferred to a country or territory outside the UK unless the country or territory ensures an adequate level of protection for the rights and freedoms of data in relation to the processing of personal data

6. Roles and responsibilities

The Trustees have overall responsibility for ensuring that Kagyu Dechen Buddhism complies with its obligations under the Data Protection Act 1998.

Day-to-day responsibilities rest with the coordinators of Kagyu Ling and Kagyu Dechen Dzong. The coordinators will ensure that all appropriate volunteers are aware of their data protection obligations, and oversee any queries related to the storing or processing of personal data.

7. Privacy/fair processing notice

7.1 Sangha Members and Newcomers

We hold personal data about sangha members and newcomers to enable communication regarding events via email and by post to sangha members. We also hold personal data relating to online ticket purchases for events, gift aid and standing orders.

This data includes, but is not restricted to:

- Contact details
- Bank Account details
- Tickets purchased
- Events attended
- Tax Payment Status

7.2 Online Ticket Purchasers

We will only hold data about Online Ticket Purchasers for a maximum of three months after the event they have purchased the ticket for.

This data includes, but is not restricted to:

- Contact details
- Event(s) attended

We will only retain the data we collect for as long as is necessary to satisfy the purpose for which it has been collected.

We will not share information with anyone without consent unless the law and our policies allow us to do so. Individuals who wish to receive a copy of the information that we hold about them should refer to sections 8 of this policy.

8. Subject access requests

Under the Data Protection legislation, sangha members, newcomers and online ticket purchasers have a right to request access to information Kagyu Dechen Buddhism holds about them. This is known as a subject access request.

Subject access requests must be submitted in writing, either by letter or email. Requests should include:

- Name of person requesting information
- A correspondence address
- A contact number and email address
- Details about the information requested

Kagyu Dechen Buddhism may choose not to reveal all the information in response to subject access requests to complaint investigations where other people's right to privacy would be compromised

Subject access requests to information will be provided within 20 calendar days.

9. Storage of records

- Paper-based records that contain personal information are kept under lock and key when not in use
- Papers containing confidential personal information should not be left on office desks or where there is general access
- Secure passwords must be used to access the organisations computers, laptops and other electronic devices that are used to store or process personal information.
- Secure password must be used to access personal information that is stored online

11. Disposal of records

Personal information that is no longer needed, or has become inaccurate or out of date, is disposed of securely.

For example, we will shred paper-based records, and delete electronic files.

12. Training

Volunteers will be informed of this Data Protection Policy and Privacy Notice on an annual basis and requested to acknowledge this. Centre coordinators will organise training for volunteers on request.

13. The General Data Protection Regulation

We acknowledge that the GDPR is retained in domestic law now the EU transition period has ended and that the 'UK GDPR' sits alongside an amended version of the DPA 2018.

Consent

Any new Sangha Member or Newcomer after 25th May 2018 must specifically request to subscribe to email circulations lists or mailing lists. With regard to Sangha Members this will include consent to receive emails mail from the Sakya Dechen Trust as well as the Kagyu Dechen Trust.

Unsubscribe

Each email sent will contain a link which will allow both Sangha Members and Newcomers to unsubscribe from circulation lists. Sangha Members and Newcomers can also request to unsubscribe from lists by contacting a Centre Coordinator.

Online Donations

As from 25th May 2018 personal data collected from online donation forms will only be kept for the minimum period of time required for legal and tax purposes as appropriate.

Gift Aid Forms

From 25th May 2018 all new gift aid forms will detail that personal information on the forms will be kept securely until no longer needed or consent to claim tax back changes. Gift aid forms completed prior to 25th May 2018 will continue to be kept securely until no longer needed or consent to claim tax back changes.

Other Online Forms

Personal data collected from other online forms will be kept for no longer than six months. This includes forms collecting information for dedication requests and ticket purchases.

Information Asset Register

As from 25th May 2018 an Information Asset Register will be kept that details all personal Information stored by Kagyu Dechen Buddhism. This register will record the following details:

- Name of asset
- What it is used for

- Where stored
- Owner of Information – who is responsible for the data
- Volume of data
- Personal data stored
- Who has access
- Who shared with
- Format of data
- Retention – who long kept for
- Risks/impact of data breach
- Key asset or not

14. Monitoring arrangements

This Data Protection Policy and Privacy Notice will be reviewed on an annual basis and the Information Asset Register will be monitored at least on an annual basis. This will involve the Data Controller meeting with a Coordinator from each Centre and reviewing the Information Asset Register and compliance with this and reporting back to the Board. This review will include the groups that are associated with each Centre.

15. Data Breaches

A personal data breach is a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data.

If a personal data breach occurs the Board will consider whether this poses a risk to the person/people who this affects. The Board will consider the likelihood and severity of the risk to people's rights and freedoms, following the breach. If the Board decide it is likely there will be a risk to any individual then they will request the Data Controller to notify the Information Commissioners Office with the details of the Data Breach.