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	Author:	RA	Authorised:	Trustees

Chesterfield Canal Trust Ltd. Personal Data Privacy Policy

1. Definitions

Personal data	Means any information relating to an identified or identifiable natural person.
Data subject	An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
Controller of personal data	Determines the purposes and means of processing personal data. Within the Trust, the designated controller is responsible for appropriate handling of personal data.
Consent of the data subject	Means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.
Personal data breach	Means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

2. Principles for Personal Data Privacy

CCT shall collect the minimum necessary amount of personal data for purposes of business operations, employee payroll, government reporting, benefit records, company compensation, and distribution of newsletters and other relevant correspondence.

CCT shall take reasonable steps to ensure that personal data that is retained is accurate.

CCT shall take reasonable steps to ensure that personal data that is retained is held securely and unauthorised access or use of the data is prevented.

Processing of personal data shall be lawful, fair, and transparent to the data subject.

Data subjects shall be able to give and withdraw consent, understanding that non-consent will constrain CCT operations with relation to the data subject.

CCT shall release personal data outside CCT only with the individual's approval, except to verify employment or as required by law.

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No personal data shall be collected or processed:

- For children below the age of 16 years without the permission of a parent or guardian.
- Associated with protected characteristics (age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage & civil partnership and pregnancy & maternity).
- Associated with special categories of personal data (race or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, health data, sexual history and/or sexual orientation, criminal data).

The rights of data subject access, transparency, information, rectification, erasure, and objection shall be supported.

All personal information shall be handled in accordance with current data protection legislation and nothing in this policy shall take precedence over current UK legislation.

3. Responsibilities

3.1 Personal Data associated with Membership Database

The Membership Database is the largest component of personal data handled by CCT. The controller for this data is the designated Trustee. The purpose of the membership data is to maintain contact with members, manage renewals of membership and collect Gift Aid. Collection, processing, and storage of membership data shall comply with the CCT principles. Consent shall be obtained as part of becoming a member.

The Membership database also contains records of past members.

The Membership Database also contains details of non-member donors. This is kept for Gift Aid purposes.

3.2 Personal Data associated with Employees

A limited amount of personal data is necessary for the effective management of employees. The controller for this data is the designated Manager of the employee. If other individuals or organisations need to know any personal data about an employee, access to such personal data shall be controlled by the Manager in compliance with current legislation and with reference to the employee where needed.

3.3 Personal Data associated with the Website

A limited amount of personal data is necessary for sales transactions online. The controller for this data is the designated Trustee. The information collected shall only be used for the purposes of administering the specific purchase.

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3.4 Volunteer Data associated with Activity Management

A limited amount of personal data is held on the Activity Manager database. The controller for this data is the designated Trustee. The information collected shall only be used for the purposes of administering the Trust's volunteer activities.

3.5 Passenger Data

A limited amount of personal data is necessary for boat trip management. The controller for this data is the designated Boat Manager. The information collected shall only be used for the purposes of administering the specific trip.

3.6 Personal Data shared between Individuals due to Trust Operations

Individuals (volunteers and employees) and third parties will share their basic personal data on the basis of personal consent. All individuals shall be cognisant of the principles for personal data privacy and not share or store such data inappropriately or make use of it for purposes reasonably judged to be outside those for which it was given.

3.7 Personal Data associated with Festivals

CCT keeps a database of stallholders, attraction operators, performers, visiting boaters, contractors, caterers, walkers, walk leaders and others involved in the running of its Festivals. The controller of the data is the Festival Coordinator. The information collected shall only be used for the purposes of organising Festivals.

3.8 Personal Data associated with Concerts

A limited amount of personal data is necessary for concert management. The controller for this data is the designated concert promoter. The information collected shall only be used for the purposes of administering the specific concert.

3.9 Email address

Non CCT email addresses are personal data. They should therefore not be shared with other persons without their permission. When sending an email to multiple people, use the BCC function to prevent personal data being shared.