



**Forest Upcycling Project Unit 8-10 Hollywood Works,
Cinderford.
Monmouthshire Upcycle, Station Yard Industrial
Estate, Chepstow.**

**Upcycle Swindon, Unit 34b Ganton Way, Techno Trading Estate,
Swindon, SN2 8ET.**

Data Protection Policy

Forest Upcycling Project is a charity working with the public and vulnerable people to provide recycling services and furniture sales among other activities. It is regulated by the Charity Commission.

The personal data that Forest Upcycling Project processes to provide these services relates to its clients and other individuals as necessary, including staff and volunteers.

This policy sets out Forest Upcycling Project's commitment to ensuring that any personal data which it processes, is carried out in compliance with data protection law. Forest Upcycling Project uses the personal data of customers, staff, volunteers and staff from other organisations, but is committed to ensuring that all the personal data that it processes is done in accordance with data protection law. Forest Upcycling Project ensures that good data protection practice is imbedded in the culture of our staff, volunteers and our organisation.

What personal information we might need and why

We may collect and process the following examples of personal information, although we may, at times, also need to collect other personal information that is not listed here:

- Names, addresses, email addresses and phone numbers.
- Job titles
- Your occupation
- Your place of work
- Information about your education and qualifications, skills and expertise
- Information required to handle complaints, conduct investigations or conduct research
- Understand people's views and opinions (for example through consultations)

Protecting your information

We have appropriate technical and organisational measures in place to protect your information.

We will handle and protect your information in line with our Information Charter¹ and the data protection principles set out in the Act:

1. Personal data will be processed fairly and lawfully.
2. Personal data will be obtained only for one or more specified and lawful purpose(s) and will not be processed in a manner that is not compatible with that purpose(s).
3. Personal data will be adequate, relevant and not excessive in relation to the purpose(s) for which they are processed.
4. Personal data will be accurate and where necessary, kept up to date.
5. Personal data will not be kept for longer than is necessary.
6. Personal data will be processed in accordance with the data subject's rights under the Act.
7. Appropriate technical and organisational measures are in place to protect personal data from unauthorised or unlawful processing and from accidental loss, damage or destruction.
8. Personal data will not be transferred to a country or territory outside of the European Economic Area (EEA) unless we can be assured there is an adequate level of protection for the rights and freedoms of the data subjects.

Accessing your information (Subject Access Requests)

Under the Act, you are entitled to ask for a copy of the personal information that we hold about you and to have any inaccuracies in your personal information corrected.

When you submit a request for your personal information, you are entitled to:

- know what personal information we are processing or have processed;



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- why we have processed your personal data – the reason(s) and purpose(s) for the processing of your personal information
- know if we have shared your personal information and if so, with whom and for what purpose(s).
 - Requests for your personal information must be submitted to us in writing.
 - Unit 1 or 4 Hollywood Works Valley Road Cinderford GL142PD
 - Email requests should be addressed to: forestupcyclingproject@gmail.com

■ **Sharing your personal information**

- We may need to share your information with third parties. This may be for a variety of reasons but will always be to enable us to undertake our statutory functions, to regulate effectively and/or to comply with our legal or regulatory obligations.
- When your personal information is shared it will be done so in line with the Act. You are entitled to know why and how we are sharing your personal information (as noted above) and the organisation or individual receiving your personal information will be required to protect your information in line with the Act.

Logging and recording of communications with you

We may log communications between you and us for the purposes described earlier in this statement.

Further information about the Data Protection Act 1998

This policy applies to personal data as defined by the Act – that is, data from which a living individual can be identified, either from that data alone, or from that data and other information that is held by the data controller. This includes information held on computer, paper files, photographs, audio recordings and CCTV or webcam footage.

Conditions under which personal data can be processed

Schedule 2 of the Act lists six possible conditions under which personal data can be processed. The processing of personal data can only take place if one of these conditions can be satisfied. The Schedule 2 conditions are:

1 The data subject has given his consent to the processing. *[This consent must be fully informed and freely given]*

2 The processing is necessary

- (a) for the performance of a contract to which the data subject is a party, or *[for example, a contract of employment or a consumer contract]*
- (b) for the taking of steps at the request of the data subject with a view to entering into a contract.

- The processing is necessary for compliance with a legal obligation to which the data controller is subject, other than an obligation imposed by contract.
- The processing is necessary in order to protect the vital interests of the data subject. *[This condition is narrowly interpreted by the Information Commissioner, and applies to emergency situations only.]*
- The processing is necessary –
 - for the administration of justice,
 - for the exercise of any functions of either House of Parliament,
 - for the exercise of any functions conferred on any person by or under any enactment,
 - for the exercise of any functions of the Crown, a Minister of the Crown or a government department, or
 - for the exercise of any other functions of a public nature exercised in the public interest by any person.
- The processing is necessary for the pursuit of legitimate interests by the data controller or by the third party or parties to whom the data are disclosed, except where such processing is unwarranted in any particular case by reason of prejudice to the rights and freedoms or legitimate interests of the data subject (2) The Secretary of State may by order specify particular circumstances in which this condition is, or is not, to be taken to be satisfied.

Information Commissioner's Office

Information Commissioner's Office (ICO) is "the UK's independent authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals" (ICO website).² It is responsible for administering the provisions of the Data Protection Act 1998 and the Freedom of Information Act 2000.



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Forest Upcycling Project aims to protect the privacy of our customers, staff and volunteers. The steps we take to ensure this takes place include:

All laptops and mobile devices that have access to our Facebook account and emails are password protected.

All laptops are locked when the office is empty.

The diaries are kept inside the office and not accessible to members of the public.

Sold items are labelled with a postcode only.

No names, addresses and phone numbers are kept on display for others to see.

Van slips are destroyed at the end of each day.

Van slips are not kept on display in the van.

Volunteer and staff information is destroyed once no longer required.

Volunteer and staff medical information and emergency contacts kept in a locked drawer.

