

# THE TEMPLAR HERITAGE TRUST

Registered with the Charity Commission for England and Wales  
**Charity Number: 1202183**

## **DATA PROTECTION POLICY**

### **1. General Principles**

The Templar Heritage Trust (THT) is a small charity, operating on a not-for-profit basis and without a paid staff. The THT does not carry out any trading activities in support of the charity. The THT trustees are the only voting members of the charity.

The THT charity trustees aim to follow the principles of the UK General Data Protection Regulations (GDPR), and also the best practice for information management that is reasonable and proportionate to the small size and limited activities of the charity.

Article 5 of the GDPR requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes (further processing for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes, shall not be considered to be incompatible with the initial purposes);
- c. adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed;
- d. accurate and, where necessary, kept up to date (every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased, or rectified without delay);
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed (personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes, subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals); and
- f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organisational measures.

The THT only processes information that is necessary:

- to establish or to maintain financial and operational support for the charity; and
- to provide or to administer activities for members, donors, or beneficiaries of the charity, or for those who otherwise have regular contact with it.

As a charity operating on a not-for-profit basis, THT is therefore not required to pay a data protection fee.

The THT charity trustees are responsible for the charity's compliance with GDPR requirements and for the charity's registration with the Information Commissioner's Office as an organisation that processes personal data.

## **2. Types of Information the THT holds**

The charity currently collects and processes the following types of information:

- names and contact details; and
- financial details.

The charity may from time to time collect and process the following types of information:

- references for applicants who are individuals; and
- identification documentation for applicants who are individuals.

## **3. Information the THT processes**

The charity only processes the information that is needed:

- to establish or to maintain the THT's membership or support functions;
- to provide or to maintain activities for members, donors, or beneficiaries of the charity, or for those who otherwise have regular contact with it;

about individuals whose data the charity needs to process for these exempt purposes.

## **4. Reasons for the THT obtaining information**

Personal information is provided to THT to process for one of the following reasons:

- to maintain the register of the charity's trustees;
- to maintain the records of the charity's advisory panel members;
- to keep individuals informed about the THT and the charity's activities;
- to consider awarding and (if approved by the trustees) to pay grants or bursaries to beneficiaries; and
- to receive and administer donations to the THT.

The THT does not receive personal information indirectly.

Under GDPR, the THT charity trustees rely on the following lawful bases for processing the information obtained by the charity, in that:

- the THT has consent, which an individual can withdraw at any time by contacting the THT via the contact details on the THT website or in the THT Foundation CIO entry on the website of the Charity Commission for England and Wales;
- the THT has a legitimate interest; and/or
- the THT has a legal obligation.

## **5. How the THT uses this information**

The THT uses the personal information given to the charity in order:

- to comply with the regulatory requirements of the Charity Commission for England and Wales;
- to maintain THT's membership and contacts records;
- to award grants and bursaries to beneficiaries; and
- to manage THT's incoming donations and finances.

THT does not share this information with third parties for any marketing purposes.

## **6. How the THT stores information**

THT stores this information in files on password-protected computers.

THT retains information for the following periods:

- applicants' names and contact details for 3 years;
- donors' names, contact details, and financial information for 3 years, or – in the case of regular giving arrangements – until the donations cease, whichever is the later;
- any individual applicants' references or identification documentations for 6 months; and
- the names and contact details of individuals, who have asked the THT to keep them informed of the charity's activities, until they request the THT to cease doing so.

## **7. How the THT deals with any breaches**

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the charity will promptly assess the risk to the individual's rights and freedoms and, if appropriate, report this breach to the Information Commissioner's Office (ICO):

[ICO website: data breaches](#)

## **8. Individuals' data protection rights**

Under data protection legislation in the United Kingdom, individuals have rights concerning their personal data including:

- the right to withdraw consent for the holding and use of their personal data at any time;
- the right to request the THT to erase their personal data in certain circumstances; and
- the right to request the THT to restrict the processing of their personal data in certain circumstances.

If an individual wishes to make any such request, please contact the THT via the contact details on the THT website or in the THT Foundation CIO entry on the website of the Charity Commission for England and Wales.