

Sierra Leone Education and Development Trust

Privacy Policy

Definitions

Charity	means Sierra Leone Education and Development Trust, a registered charity.
GDPR	means the General Data Protection Regulation.
Responsible Person	means Kevin Curley

1. Data protection principles

Sierra Leone Education and Development Trust is a registered charity and is committed to processing data in accordance with its responsibilities under the General Data Protection Regulations (GDPR) 2018.

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.

Appendix A provides details of the data we keep and why. The appendix was adopted at the same time as the policy and will be reviewed along with the policy.

2. General provisions

- a. This policy applies to all personal data processed by the Charity.
- b. The Responsible Person shall take responsibility for the Charity's ongoing compliance with this policy.
- c. This policy shall be reviewed at least every three years unless there are changes in GDPR legislation or regulations

3. Lawful, fair and transparent processing

- a. Individuals have the right to access their personal data and any such requests made to the charity shall be dealt with in a timely manner.

4. Lawful purposes

- a. All data processed by the charity must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests ([see ICO guidance for more information](#)).
- b. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- c. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent will be clearly communicated and systems shall be in place to ensure such revocation is reflected accurately in the Charity's systems.

5. Data minimisation

- a. We shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

6. Accuracy

- a. We shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps are in place to ensure that personal data is kept up to date.

7. Archiving / removal

- a. We shall ensure that we retain personal information for as long as necessary to fulfil the purposes we collected it for, including purposes of satisfying any legal or reporting requirements.

8. Security

- a. We shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- b. Access to personal data shall be limited to personnel who need access and appropriate security is in place to avoid unauthorised sharing of information.
- c. When personal data is deleted this is done safely such that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions are in place.

9. Breach

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, we shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO ([more information on the ICO website](#)).

END OF POLICY