

KRISHNAMURTI FOUNDATION TRUST

Foundation

DATA PROTECTION POLICY

Last Review Date	April 2018
Policy endorsed by	The Trustees, Directors and Bursar
Policy is maintained by	Bursar
Next review date	August 2019
Review body	Bursar and Foundation Director

Krishnamurti Foundation Trust Ltd is the legal entity and is the "data controller". There are four departments in the Trust and we have put in place structures in each department to upload the data subject's rights. Only information related to ancillary functions is shared between departments. This policy is for the Foundation department (Foundation).

This policy is reviewed annually and is in line with the new EU General Data Protection Regulations (GDPR) and The Data Protection Act 2017. Although the principles of the new legislation remain broadly the same as current arrangements, the importance of how organisations manage data protection is emphasised and recognised by the Foundation.

WHAT THIS PRIVACY NOTICE IS FOR

This policy is intended to provide information about how the Foundation will use (or "process") personal data about individuals including its volunteers, publishers, agents, Information Centres and International Committees.

This information is provided because Data Protection Law gives individuals rights to understand how their data is used. Staff and volunteers are all encouraged to read this policy and understand the Foundation obligations to its community.

Anyone who works for, or acts on behalf of, the Foundation (including staff, volunteers, governors and service providers) should also be aware of and comply with the data protection policy for staff, which can be found in the Staff Handbook section 3.

RESPONSIBILITY FOR DATA PROTECTION

The Foundation has appointed the Bursar as the lead for Data Protection and in conjunction with the Directors, will endeavour to ensure that all personal data is processed in compliance with this policy and the Acts.

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TYPES OF PERSONAL DATA PROCESSED BY THE FOUNDATION

This will include by way of example:

- Contact details (for example, last name, first name, telephone number, email)
- Personal information (for example nationality)

Credit card details are not retained and only used for processing the transactions as per the PCI DSS (MID412432)

HOW DATA IS COLLECTED

Personal data may be collected on a variety of occasions, including:

- When becoming an Information Centre
- When becoming an International Committee member
- Signing up to receive the Foundation Bulletin and other publications of the Foundation
- When negotiating a contract and when signing a contract for publication

For volunteers:

- Contact details (for example, last name, first name, telephone number, email)
- Personal information (for example, date of birth, nationality)
- Copy of photo ID
- Disability (if volunteers for consideration of task)

WHO HAS ACCESS TO PERSONAL DATA AND WHO IS IT SHARED WITH

Occasionally, the Foundation will need to share personal information relating to its community with third parties, such as:

- professional advisers (e.g. lawyers, insurers, PR advisers and accountants);
- government authorities (e.g. HMRC, police or the local authority); and
- appropriate regulatory bodies

Personal data collected by the Foundation will remain within the Foundation, and will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know' basis).

HOW LONG WE KEEP PERSONAL DATA

The Foundation will retain personal data securely and only in line with how long it is necessary to keep for a legal and lawful basis as per the organisation's Records Retention and Disposal Policy.

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LEGAL BASIS

The Foundation is mainly relying on legitimate interest for keeping information about Information Centres and International Committees, and relying on contact for keeping information about publishers, agents and volunteers. When consent is used for maintaining your information, you have the right to withdraw your consent. We will gather and retrain data when required to meet our legal obligation.

YOUR RIGHTS

All data subjects have the following rights:

- The right to be informed.
- The right of access.
- The right to rectification.
- The right to erasure.
- The right to restrict processing.
- The right to data portability.
- The right to object.
- Rights in relation to automated decision making and profiling.

In relation to your right to access your personal data, commonly known as subject access request, collected by the Foundation and to modify it subject to applicable legal provisions. You may also exercise your right to object by writing to the following address: The Bursar, Krishnamurti Foundation Trust Ltd, Brockwood Park, Bramdean, Hampshire, SO24 0LQ.

For the purposes of confidentiality and personal data protection, we will need to identify you in order to respond to your request. You will be asked to include a copy of an official piece of identification, such as a driver's license or passport, along with your request.

All requests will receive a response as swiftly as possible and in accordance with applicable law.

DATA ACCURACY AND SECURITY

The Foundation will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible and to keep all your personal information confidential and only use this information in compliance with the data protection laws.

An individual has the right to request that any out-of-date, irrelevant or inaccurate or information about them is erased or corrected (subject to certain exemptions and limitations under Data Protection Law).

The Foundation will take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around use of technology and devices, and access to school systems. All staff and governors will be made aware of this policy and their duties under Data Protection Law and receive relevant training.

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QUERIES AND COMPLAINTS

Any comments or queries on this policy should be directed to the Bursar using the following contact details: The Bursar, Krishnamurti Foundation Trust Ltd, Bramdean, Hampshire SO24 0LQ. Telephone 01962 771 744 or email bursar@brockwood.org.uk

If an individual believes that the Foundation has not complied with this policy or acted otherwise than in accordance with Data Protection Law, they should utilise the school [complaints / grievance] procedure and should also notify the Bursar. You can also make a referral to or lodge a complaint with the Information Commissioner's Office (ICO), although the ICO recommends that steps are taken to resolve the matter with the school before involving the regulator.