

GDPR AND DATA PROTECTION POLICY

CBRL needs to gather and use certain information about individuals with whom the organisation has a relationship or may need to contact. Within this document, this information is referred to as personal data.

This document describes how personal data will be collected, handled and stored to meet data protection standards and comply with the General Data Protection Regulation (GDPR). This document also includes details about an individual's privacy rights and how they can contact CBRL regarding their data. Except for personal data of our current staff, which is covered by a separate privacy notice, this policy applies to all personal data processed by CBRL.

In compliance with GDPR, CBRL is registered with the Information Commissioner's Office and has appointed trustee Tom Thomson as Data Protection Officer (supported by the CBRL Director and Executive Officer) responsible for all CBRL data processing and CBRL's ongoing compliance. As a charity registered in the UK, all CBRL data collection and processing will be done in compliance with GDPR.

GDPR Regulations

CBRL is committed to processing data in accordance with its responsibilities under the GDPR.

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 is processed;
- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that is inaccurate, having regard to the purposes for which it is 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 is 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 personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organisational measures.

Legal Basis on which CBRL Processes Personal Data

Personal data held by CBRL about you will be lawfully processed based on one of the following legal reasons (known as a “legal basis”):

- a. All data processed by CBRL 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. Because the processing is necessary for a “legitimate interest”, a legitimate interest in this context means a valid interest CBRL has or a third party has in processing your personal data which is not overridden by your interests in data privacy and security.
- c. Because the processing is necessary to comply with our obligations under a contract; or
- d. Because you have consented to the processing. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- e. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the CBRL’s systems (see section 8).
- f. CBRL shall review the personal data (and the categories of personal data) that is being held on a regular basis to ensure the data held is still relevant to CBRL and is accurate. If CBRL discovers that certain personal data held is no longer necessary or accurate, reasonable steps will be taken to correct or delete this data as may be required (see section 8).

Personal Data which We Collect

- a. CBRL may collect and process personal data about an individual when they become a member; apply for a grant; participate in our activities and services; engage with our social media; donate; sign up to receive emails; register for an event; attend an event.
- b. CBRL shall ensure that personal data is adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed.
- c. CBRL may collect and process the following personal data:

Category of personal data	Type of data CBRL may collect
Membership subscriptions	Name, email, postal address, institution, area of academic interest
Mailing list sign-up	Name, email, postal address, academic interest area
Event attendee details	Name, email optional
Event speakers	Name, contact details, academic interest, biographical information
Grant or prize applications	Name, contact details, institution, professional position

Job applications	Name, contact details, past and current employment history
Donors	Direct debit forms, gift aid forms, bank details, name, contact details
Email correspondence	Name, email address, record of emails

How We May Use Personal Data

- a. CBRL may use information for a number of purposes including the following:
 - i. to provide a person with the services, products or information they have requested or which we feel may interest them where they have consented to being contacted;
 - ii. to process donations;
 - iii. to provide a person with information about our work and/or our activities;
 - iv. for internal record keeping, including the management of any feedback or complaints;
 - v. to target communications and messages;
 - vi. where it is required or authorised by law.
- b. If CBRL is under a duty to disclose personal data to comply with any legal obligation, personal data to third parties (for example to government bodies and law enforcement agencies), or to protect CBRL, for example in cases of suspected fraud or defamation.

Data Retention

- a. CBRL will keep personal data for as long as required to operate the service in accordance with legal requirements and tax and accounting rules.
- b. Where personal data is no longer required, CBRL will ensure it is disposed of in a secure manner.
- c. Individuals have the right to access their personal data and any such requests made to CBRL shall be dealt within 30 days (see section 8).

Category of personal data	Retention period
Membership subscriptions	Permanently until data subject unsubscribes
Mailing list sign-up	Permanently until data subject unsubscribes
Event attendee details	Permanently until data subject unsubscribes
Event speakers	Contact details – permanently until data subject unsubscribes. Biographical information will remain indefinitely on the CBRL website unless the data subject requests removal.

Grant or prize applications	7 years - where awarded, data will be held permanently until the data subject requests to be deleted
Job applications	7 years – where appointed, data will be held permanently until the data subject requests to be deleted
Donors	7 years
Email correspondence	Emails deleted continually as/when no longer required. Emails required for future reference will be archived twice yearly

Security

- a. CBRL shall ensure that personal data is stored securely using software that is password protected and kept up to date. Where data is held in hard copy, it shall be stored in locked archives.
- b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c. When personal data is deleted, this should be done safely such that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions shall be in place.
- e. We will ensure that CBRL staff are aware of their privacy and data security obligations. We will take reasonable steps to ensure that staff or third parties working on behalf of CBRL are aware of their privacy and data security obligations.

Data Breach

- a. If personal data CBRL holds about you is subject to a breach or unauthorised disclosure or access, we will report this to the Information Commissioner’s Office (ICO) and/or our data protection manager.
- b. If a breach is likely to result in a risk to your data rights and freedoms, we will notify you as soon as possible.

Reporting a Personal Data Breach

If you know or suspect that a Personal Data Breach has occurred:

- Do not attempt to investigate the matter yourself.
- Immediately contact the CBRL Director cpalmer@cbrl.ac.uk and Executive Officer cgrauls@cbrl.ac.uk with details of the breach (incident: when it happened, how it happened (what digital channel/ platform eg: email/ social media), who was involved). Send a copy of your report to dpo@cbrl.ac.uk
- You should preserve all evidence relating to the potential Personal Data Breach.

Your Privacy Rights

The GDPR provides the following rights for individuals:

- a. The right to be informed about the collection and use of personal data.
- b. The right of access:
Individuals may make a subject access request to request information about the personal data held about them (free of charge, save for reasonable expenses or repeat requests).
- c. The right to correction:
Individuals are asked to inform CBRL if the information held about them is incomplete or inaccurate in any way. CBRL will update data records within 30 days of this.
- d. The right to be forgotten:
An individual may ask CBRL to delete all data held on them (although in practice this may limit or restrict our ability to provide services). Unless CBRL has reasonable grounds to refuse the erasure, on receipt of such a request CBRL will securely delete the personal data in question within 30 days. The data may continue to exist in backup form, but CBRL will take steps to ensure that it will not be accessible.
- e. The right to restrict processing:
An individual may request that CBRL no longer process their personal data in certain ways, whilst not requiring data deletion. This is not an absolute right and only applies in certain circumstances.
- f. The right to data portability:
An individual has the right to receive copies of personal data held by CBRL about them in a commonly used and easily storable format.
- g. The right to object:
Unless CBRL has overriding legitimate grounds for such processing, an individual may object to the processing of their personal data in certain circumstances.
- h. The right to withdraw consent:
Where consent is required for CBRL to process personal data, the individual may withdraw consent at any time.

Contact Us

If at any time you would like to contact us with your views about our privacy practices, or with any enquiry or complaint relating to your personal information or how it is handled, you can do so via the following:

- CBRL Data Protection Officer, c/o Council for British Research in the Levant, 10 Carlton House Terrace, London, SW1Y 5AH, at dpo@cbri.ac.uk.