

## Data Protection Policy: Charlotte's Tandems

### Potential Borrowers

The Contact Form (available from the website) allows the applicant to consent to the Charity using the details provided by them, via a tick box. These details include at least names, email addresses and locations. If consent is given for the Charity to use data then the Secretary forwards the Contact Form and subsequent emails to the appropriate Helper(s).

The Secretary also adds **Limited Details** (first names, ages or inside leg measurements, Email address, approximate location and date of contact) to the appropriate regional waiting list.

Occasionally, a Contact Form is not used and instead a direct email or Borrower's Form is sent. In these cases, Consent for the charity to use the Potential Borrower's details will be sought by the Secretary, before the application is sent to the Helper(s) or added to the waiting lists.

The waiting lists are emailed to the relevant Helpers several times per year and the Helpers delete old lists on receipt of the new list. The lists and Borrower's Emails will not be forwarded outside the Charity.

Helpers may make their own copies of the Waiting Lists, annotating them with details that they have received.

The Borrower's Form, also available from the website, requires further information (e.g. full address, riding surface etc) from the potential Borrower. This (if provided) helps the Helper, along with the Contact Form, subsequent emails and the waiting lists to arrange the hire of a suitable tandem (or other cycle).

### Borrowers

When the Borrower collects the tandem then they must hand over a paper copy of the Borrower's Form. **Very Limited Details** from the Form (i.e. the first names or pseudonyms of both riders and their approximate location) are used on the Charity's website, social media and advertising. Other details may be added, but only with extra (often verbal) permission from the Borrower.

Existing Borrowers have the Charity's property and therefore the charity needs to retain their details, hence Consent for the Charity to use their data is implied. Ex-Borrowers have had our property and therefore Consent for the Charity to use their details is also implied.

One of the terms and conditions of hire is that the Borrowers will send a photo of the Stoker with the tandem and some comments. The Charity publishes these, along with the **Very Limited Details** described above. The photo does not have to contain faces and we will only use first names (or pseudonyms) and locations, which can be approximate. Identification can therefore be very hard or impossible. Photos, names and locations can be changed, if required.

The photo is a lovely memento for our Helpers (as they help us for free), helps us advise about maintenance and show others how much fun people have on our bikes. We do not publish surnames, email addresses, full home addresses or medical conditions, unless the Borrower specifically agrees to it.

We sometimes contact previous/current Borrowers for further information for our own advertising. We do not pass on contact information outside Charlotte's Tandems without further consent.

### Ex-Borrowers

On return of our property, the Borrower's Form will be deleted, but the **Limited Details** will be retained on our Waiting List, in case the ex-Borrower wishes to borrow again, as many do so.

## **Potential Donors, Donors of tandems and Large Financial Donors, whose funds are used to buy tandems**

These Donors are treated in the same way as Potential Borrowers: their **Limited Details** are added to the Waiting Lists. Details of these Donors and Potential Donors are retained for as long as we have the tandem or as long as the tandem is available.

### **Helpers**

Full details about the Helpers are kept by the Chairman and limited information about them (name, location and email address) is given on the Waiting Lists. Limited information about them (including photos) is presented on our website and social media. They also agree to the Data Protection Policy by signing the Safeguarding Form.

### **Trustees**

Limited data on the Trustees (names and photos) is presented on our website and social media and their names are listed on the Charity Commission website. They also agree to the Data Protection Policy by signing the Safeguarding Form.

### **Members**

Names of the official Members of the charity are kept in the Minutes of Meetings but are not published further. "Members" of our Facebook group or other social media are not official Members and they can delete their own data from social media, if required.

### **Other contacts**

Occasionally we get other requests, e.g. to attend events. We also contact people on our lists to see if they'd like to become our Helpers, attend our AGMs etc. We control their data in the similar ways as above.

### **Storage Methods**

Data will be stored electronically and/or on paper and stored securely by those with the data. Any loss of data will be reported to the Data Protection Policy.

### **Deletion of data**

Data can be deleted from our records on request to [info@CharlottesTandems.co.uk](mailto:info@CharlottesTandems.co.uk). It will be deleted unless the Borrower or Helper has our property, however we reserve the right to keep published a photo, and the **Very Limited Details** described above.

All Email conversations will be deleted a year after the last message in the conversation. Potential Borrowers will be removed from our waiting lists a year after last contact. As Waiting Lists are emailed between Helpers, Potential Borrowers details may remain on our emails for about a year and a half. We keep the Potential Borrower's data for a year as people often do not borrow from us immediately after contacting us for the first time. Sometimes they need prompting and sometimes take up to a year before borrowing.

Any proof of disability sent to us will be destroyed. We only need to see proof during collection (not keep the proof).

Any tags or mentions on our Facebook (or other social media) can be deleted, on request, however we reserve the right to keep published a photo, and the **Very Limited Details** described above for our Borrowers and ex-Borrowers.

Written by Alex Reeves (Data Protection Officer) agreed by the Trustees to come into force on 25<sup>th</sup> May 2018