

Introduction

Data protection law specifies that controllers must inform data subjects about how they use their personal information. This means that Malvern Hills Foodbank must inform the people that use foodbanks, our supporters, volunteers and other data subjects about how we collect and use their personal information. This is often referred to as 'privacy information'.

Privacy information should be understandable and accessible, presented legibly, in a reasonable font size, and written in easy to understand language that avoids jargon or overly legalistic terminology.

Privacy information that must be provided to data subjects

- The identity of the controller
- The purpose of the processing and the lawful basis for the processing
- Categories of personal data
- Any recipient or categories of recipients of personal data
- Details of transfers to third countries and safeguards
- The retention period or criteria used to determine the retention period
- The existence of each data subject right
- The right to withdraw consent, where relevant, at any time
- The right to lodge a complaint with a supervisory authority
- The source the personal data originates from
- Whether the provision of personal data is part of a statutory or contractual requirement of obligation and possible consequences of failing to provide the personal data
- The existence of automated decision making, profiling and information about how decisions are made, the significance and the consequences

Providing privacy information

It is likely to be inappropriate or impossible to include all the required privacy information at the first point at which personal information is being collected.

The ICO recommends a layered approach and providing information in a range of ways. This layered approach can be useful as it allows you to provide the key privacy information immediately and have more detailed information available elsewhere for those that want it. This is helpful where there is not enough space to provide more detail.

Privacy information can be provided through a variety of media including:

- Orally - face to face or when you speak to someone on the telephone
- In writing - printed media, printed adverts, forms, such as registration forms
- Through signage - for example an information poster in a public area
- Electronically - in text messages, on websites, in emails. In addition to this, it is necessary to include privacy information when collecting personal information in writing or verbally.

This privacy information is often called a Fair Processing Notice (FPN) or Privacy Notice / Statement.

Fair Processing Notices

Information usually included in a FPN when collecting personal information is:

- The identity of the controller
- The purpose of the processing and the lawful basis for the processing
- Notice if personal information may be shared with any other organisation (other than for routine third party processing e.g. mailings or deliveries)
- Notice if personal information may be transferred outside of the EEA
- Notice of any processing of personal information that the data subject might not reasonably expect e.g. automated decision making or profiling
- Reference to where the remainder of the privacy information can be found e.g. a link to a Privacy Policy

FPN

Anyone recording information relating to a client, whether on paper or on a computer will inform the person verbally as follows:

Malvern Hills Foodbank will use the personal information that you provide in accordance with the Data Protection Act 2018 to provide you with a food voucher, check your previous use of foodbanks and fulfil voucher requests. A Data Privacy Policy is available on our web site.

Anyone recording information relating to a volunteer or supporter will inform the person verbally as follows:

Malvern Hills Foodbank will use the personal information that you provide in accordance with the Data Protection Act 2018 to contact you, provide you with information and enable us to hold necessary data (E.g. Next of kin for volunteers). A Data Privacy Policy is available on our web site.

Data Security

Data held on paper will be kept in a locked cabinet

Data held electronically will be in the Trussell Trust Data Collection System (DCS) or other password protected secure storage system. Any data extracted from these systems will be anonymised before being used for statistical purposes. Data downloaded (e.g. to print off an e-voucher) will be deleted permanently once used.

Access to the DCS is restricted to those who need to know, with appropriate levels of access. For further information about how we use personal information see our Privacy Policy – available at <https://www.malvernhills.foodbank.org/privacy>

Malvern Hills Foodbank is registered as a data controller with the UK Information Commissioner's Office under registration number 00045512294