Wiltshire Wildlife Community Energy

LESS CARBON, MORE WILDLIFE

Data Protection Policy

Wiltshire Wildlife Community Energy (WWCE)
Effective Date: 15th April 2026

1. Introduction

Wiltshire Wildlife Community Energy (WWCE) is committed to protecting the rights and freedoms of individuals in accordance with the provisions of the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR). This policy outlines the principles and procedures governing the collection, processing, storage, and disposal of personal data by WWCE in the course of its legitimate not-for-profit operations.

2. Legal Basis for Processing Personal Data

WWCE is not required to register with the Information Commissioner's Office (ICO) pursuant to the exemptions applicable to not-for-profit organisations where:

- Personal data is processed solely for the purposes of establishing or maintaining membership or support;
- The data is used only for administering activities for members or those in regular contact with the organisation; and
- There is no disclosure to third parties without data subject consent or an equivalent lawful basis.

3. Data Protection Principles

WWCE shall process personal data in compliance with the following data protection principles. Personal data shall be:
a) Processed lawfully, fairly, and in a transparent manner;
b) Collected for specified, explicit, and legitimate purposes and not further processed in a manner incompatible with those purposes;
c) Adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed;
d) Accurate and, where necessary, kept up to date;
e) Retained only for as long as necessary for the stated purposes;
f) Processed in a manner that ensures appropriate security, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical and organisational measures.



4. Data Subjects' Rights

WWCE recognises and upholds the rights of data subjects, including:

- The right to be informed about the collection and use of their personal data;
- The right of access to their personal data;
- The right to rectification of inaccurate or incomplete data;
- The right to erasure ("right to be forgotten") where appropriate;
- The right to restrict processing under certain circumstances;
- The right to data portability (where applicable);
- The right to object to processing, including for direct marketing purposes;
- Rights in relation to automated decision-making and profiling (if applicable).

Requests by data subjects to exercise any of the above rights must be made in writing and will be responded to within one calendar month, subject to verification of identity.

5. Third-Party Processors and Data Sharing

Where WWCE engages third-party service providers or suppliers to process personal data on its behalf, it shall ensure that such processors:

- Provide sufficient guarantees of their data protection and information security capabilities;
- Enter into a legally binding data processing agreement that reflects the requirements of the UK GDPR;
- Adhere to data protection principles consistent with those of WWCE.

WWCE will not share personal data with third-party organisations unless:

- The data subject has provided explicit consent;
- The recipient organisation has in place a data protection policy that meets or exceeds the standards of WWCE; or
- The recipient agrees, in writing, to be bound by the terms of this policy or enters into an equivalent contractual arrangement.

6. Data Security

WWCE shall implement appropriate technical and organisational measures to safeguard personal data, including but not limited to:

- Password protection and user access controls;
- Encryption of sensitive information;
- Regular software updates and secure backup procedures.

Any actual or suspected data breach involving personal data must be reported immediately to the WWCE Board. WWCE shall assess the risk to individuals and, where required, report the breach to the ICO within 72 hours.

7. CCTV Surveillance

Where CCTV systems are in operation at WWCE premises, such systems shall be operated by a third-party contractor acting on behalf of WWCE. The appointed contractor shall ensure compliance with the Data Protection Act 2018 and shall implement a CCTV data protection policy consistent with the requirements of this policy and UK data protection law.

8. Policy Review and Amendments

This policy shall be reviewed annually or more frequently if necessitated by changes in law, regulation, or WWCE operational activities. WWCE reserves the right to amend this policy at any time. Where material changes are made, affected parties shall be notified via appropriate channels, including email or postal correspondence.

9. Governance and Oversight

The WWCE Board shall be responsible for overseeing the implementation and ongoing compliance with this policy. All officers, employees, volunteers, and contractors are required to adhere to this policy and will be provided with appropriate training and guidance.

Approved by the Board of Directors: Chair: Julian R Barlow