



## Data Protection Policy

Revised 1 April 2018

Updated 1 January 2026

### **FODC will process personal data fairly and lawfully**

FODC holds personal data of members, sponsors and others. The Secretary to the Trustees will act as Data Protection Officer. Any Trustee or other member who holds personal data relevant to the Friends' activities will make this known to the Secretary. The Secretary will review this policy document periodically and report any concerns to the Board of Trustees.

### **FODC will hold data only for specified lawful purposes**

**Members.** We hold contact data of our members so that:

- i. we can comply with the requirements of the Charity Commission that we do so; and
- ii. we can run our Charity according to the wishes of our members in line with our Constitution.

**Working Parties.** The Working Party Supervisors will hold contact data and disclosed medical information on our members attending working parties so that:

- i. he or she can contact them about volunteering sessions
- ii. he or she can help ensure the welfare of all members is considered in work planning

We also hold attendance records of which sessions members have attended for insurance and health and safety reasons, and at year end the attendance data will be passed to the Secretary.

**Grave Maintenance Scheme.** We hold contact data on individuals who have enrolled in our Grave Maintenance Scheme so that we can send them requests for payment and to tell them about when we have done maintenance work on their family graves and/or when remedial work is deemed necessary.

**War grave adopters.** We hold contact information of individuals and groups who have volunteered to take part in caring for War Graves so that we can communicate with them about any matters concerning their adopted grave(s) and events in the Cemetery relative to them.

**Requests for help from the public.** We hold contact information of individuals and groups who have asked FODC for specific help but only until the request has been fulfilled and finalised. For example locating a grave for an ancestor.

## **FODC will ensure that the personal data we hold will be adequate, relevant and not excessive**

We hold only data on name, address, email address, telephone number, and specifically in respect of members who attend working parties, information on disclosed medical information to help ensure their welfare is considered when planning work at working parties. We also hold name and telephone number information for a person nominated by a member to be used in an emergency.

## **FODC will ensure personal data is accurate and kept up to date**

Errors in personal data notified to us will be corrected promptly. Members will be asked to confirm at each AGM the information they have provided to FODC is accurate and correct.

## **FODC will process data in accordance to the rights of the data subject**

Consent will be required before individuals are contacted about any activity that is not one of the legitimate interests of FODC. The right to erasure will be effected promptly. Information requests will be answered within one month.

## **FODC will not transfer personal data unless required by law**

We share personal data about our Trustees with the Charity Commission according to the rules of the Commission. By our constitution, we are required to give the name and address of our members to any member who asks for it. We will require an undertaking from any member who requests this that they have adequate data protection procedures in place. FODC will not otherwise share personal data without explicit permission of the data subject unless there is a legal requirement to do so.