

ABM DATA PROTECTION AND PRIVACY POLICY (Inc. SAR & FOI Policy)

The ABM holds your data in compliance with all relevant and applicable privacy laws including the Data Protection Act and General Data Protection Regulations.

What we collect and why:

We collect personal data including name, postal address, email address and phone number. We use this information to appropriately and accurately process your membership subscriptions and training communications, and to share opportunities and events from the ABM and other organisations. We may occasionally share your contact details (with prior consent) when you volunteer to be involved in working parties/sub-committees, and only with the other volunteers on those teams.

We also photograph ABM events which may contain images of individuals. Separate consent is sought before using these photographs to promote ABM activities on our website and social media.

We never share any personal details or photographs with any individual or any 3rd party organisation outside of the ABM, with the exception of setting up payment requests and user accounts on PayPal, Xero and our website.

Your data is stored in safeguarded and protected cloud-hosted software and systems, with a variety of password protection and encryption. It is only accessible by ABM staff and volunteers.

For further information, to request the details we have on file for you, to change any details or ask to be removed, please contact the Administrator via admin@abm.me.uk

A full audit of our data storage and usage is reviewed annually by the ABM Trustees.

Website cookie use:

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to

your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

Subject Access Request (SAR) and Freedom of Information (FOI) Request Policy

The General Data Protection Regulation (GDPR) gives individuals the right to find out what information an organisation holds about them. SARs may be made in writing by letter or email, or verbally. The ABM supports the ICO guidance suggesting that it is best practice to make SARs in writing, in order to create a paper trail and avoid any misinterpretation. The ABM may seek verification of the individual making the SAR's identity.

SARs will be handled by a dedicated team of ABM Trustees who deal with all complaints and information requests.

SARs are not subject to a fee unless the request is an unusually large or complex one where a reasonable administration fee may be charged.

Legal counsel may be sought before providing data. Data released by the ABM must only be done so after ensuring the protection of other individuals involved who do not consent to their data being shared. It may not be possible to extract meaningful data without compromising someone else's right for their data to remain confidential. In such cases a full explanation of this will be given.

The ABM may provide data that has details redacted (ie. blanked out) to protect others' data.

SARs should be dealt with within one month of receipt unless the request is unusually large or complex. If this is the case, the ABM may request a further 2 months in order to complete their investigation and document gathering.

The ABM follows the legal guidance provided by our own contracted lawyers and the Information Commissioners' Office: <https://ico.org.uk/your-data-matters/your-right-to-get-copies-of-your-data/>

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The Freedom of Information Act 2000 (FOIA) allows individuals to access information from public authorities. As such, charities like the ABM are not generally directly subject to FOI requests, though they may be asked to provide information requested under the FOIA if in relation to a professional relationship with a public authority. Should such a situation arise, the ABM will follow the procedure as above for SARs, including seeking appropriate legal counsel on the data provided and our duty to do so.