



DATA PROTECTION POLICY AND PROCEDURE

Version 6	By YM	Approved by Trustees	February 2026
Date	19.02.26	Next review due	February 2027

Introduction

1.1 This Policy sets out the obligations of Borderlands (South West) Limited (“Borderlands”) regarding data protection and the rights of its members, donors, volunteers, employees, trustees and hotel residents (“data subjects”) in respect of their personal data under EU Regulation 2016/679 General Data Protection Regulation (“GDPR”).

1.2 The GDPR defines “personal data” as any information relating to an identified or identifiable natural person (a “data subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

1.3 This Policy sets out Borderlands’ obligations regarding the collection, processing, transfer, storage, and disposal of personal data. The procedures and principles set out here must be followed at all times by Borderlands, its employees, agents, contractors, or other parties working on its behalf.

1.4 Borderlands is committed not only to the letter of the law, but also to the spirit of the law and places high importance on the correct, lawful, and fair handling of all personal data, respecting the legal rights, privacy, and trust of all individuals with whom it deals.

2. The Data Protection Principles

This Policy aims to ensure compliance with the GDPR. The GDPR sets out the following principles with which any party handling personal data must comply. All personal data must be:

2.1 Processed lawfully, fairly, and in a transparent manner in relation to the data subject.

2.2 Collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes. Further processing for archiving



purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes.

2.3 Adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed.

2.4 Accurate and, where necessary, kept up to date. Every reasonable step must be taken to ensure that personal data that is inaccurate, having regard to the purposes for which it is processed, is erased, or rectified without delay.

2.5 Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed. Personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes, subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of the data subject.

2.6 Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organisational measures.

3. The Rights of Data Subjects

3.1 The GDPR sets out the following rights applicable to data subjects (please refer to the parts of this policy indicated for further details):

- The right to be informed (Part 12).
- The right of access (Part 13);
- The right to rectification (Part 14);
- The right to erasure (also known as the ‘right to be forgotten’) (Part 15);
- The right to restrict processing (Part 16);
- The right to data portability (Part 17);
- The right to object (Part 18);
- and Rights with respect to automated decision-making and profiling (Parts 19 and 20).

4. Lawful, Fair, and Transparent Data Processing



4.1 The GDPR seeks to ensure that personal data is processed lawfully, fairly, and transparently, without adversely affecting the rights of the data subject. The GDPR states that processing of personal data shall be lawful if at least one of the following applies:

4.1.1 The data subject has given consent to the processing of their personal data for one or more specific purposes;

4.1.2 The processing is necessary for the performance of a contract to which the data subject is a party, or in order to take steps at the request of the data subject prior to entering into a contract with them;

4.1.3 The processing is necessary for compliance with a legal obligation to which the data controller is subject;

4.1.4 The processing is necessary to protect the vital interests of the data subject or of another natural person;

4.1.5 The processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller;
or

4.1.6 The processing is necessary for the purposes of the legitimate interests pursued by the data controller or by a third party, except where such interests are overridden by the fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

4.2 If the personal data in question is “special category data” (also known as “sensitive personal data”) (for example, data concerning the data subject’s race, ethnicity, politics, religion, trade union membership, genetics, biometrics (if used for ID purposes), health, sex life, or sexual orientation), at least one of the following conditions must be met:

4.2.1 The data subject has given their explicit consent to the processing of such data for one or more specified purposes (unless EU or EU Member State law prohibits them from doing so);

4.2.2 The processing is necessary for the purpose of carrying out the obligations and exercising specific rights of the data controller or of the data subject in the field of employment, social security, and social protection law (insofar as it is authorised by EU or EU Member State law or a collective agreement pursuant to EU Member State law which provides for appropriate safeguards for the fundamental rights and interests of the data subject);



4.2.3 The processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent;

4.2.4 The data controller is a foundation, association, or other non-profit body with a political, philosophical, religious, or trade union aim, and the processing is carried out in the course of its legitimate activities, provided that the processing relates solely to the members or former members of that body or to persons who have regular contact with it in connection with its purposes and that the personal data is not disclosed outside the body without the consent of the data subjects;

4.2.5 The processing relates to personal data which is clearly made public by the data subject;

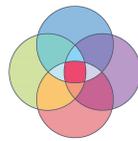
4.2.6 The processing is necessary for the conduct of legal claims or whenever courts are acting in their judicial capacity;

4.2.7 The processing is necessary for substantial public interest reasons, on the basis of EU or EU Member State law which shall be proportionate to the aim pursued, shall respect the essence of the right to data protection, and shall provide for suitable and specific measures to safeguard the fundamental rights and interests of the data subject;

4.2.8 The processing is necessary for the purposes of preventative or occupational medicine, for the assessment of the working capacity of an employee, for medical diagnosis, for the provision of health or social care or treatment, or the management of health or social care systems or services on the basis of EU or EU Member State law or pursuant to a contract with a health professional, subject to the conditions and safeguards referred to in Article 9(3) of the GDPR;

4.2.9 The processing is necessary for public interest reasons in the area of public health, for example, protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of EU or EU Member State law which provides for suitable and specific measures to safeguard the rights and freedoms of the data subject (in particular, professional secrecy);

or 4.2.10 The processing is necessary for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes in accordance with Article 89(1) of the GDPR based on EU or EU Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data



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5. Specified, Explicit, and Legitimate Purposes

5.1 Borderlands collects and processes the personal data set out in Part 21 of this Policy. This includes:

5.1.1 Personal data collected directly from data subjects and personal data obtained from third parties.

5.2 Borderlands only collects, processes, and holds personal data for the specific purposes set out in Part 21 of this Policy (or for other purposes expressly permitted by the GDPR).

5.3 Data subjects are kept informed at all times of the purpose or purposes for which Borderlands uses their personal data. Please refer to Part 12 for more information on keeping data subjects informed.

6. Adequate, Relevant, and Limited Data Processing

Borderlands will only collect and process personal data for and to the extent necessary for the specific purpose or purposes of which data subjects have been informed (or will be informed) as under Part 5, above, and as set out in Part 21, below.

7. Accuracy of Data and Keeping Data Up-to-Date

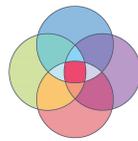
7.1 Borderlands shall ensure that all personal data collected, processed, and held by it is kept reasonably accurate and up-to-date. This includes, but is not limited to, the rectification of personal data at the request of a data subject, as set out in Part 14, below.

7.2 The accuracy of personal data shall be checked when it is collected and at regular intervals after that. If any personal data is found to be inaccurate or out-of-date, all reasonable steps will be taken without delay to amend or erase that data, as appropriate.

8. Data Retention

8.1 Borderlands shall not keep personal data for any longer than is necessary in light of the purpose or purposes for which that personal data was originally collected, held, and processed.

8.2 When personal data is no longer required, all reasonable steps will be taken to erase or otherwise dispose of it without delay.



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8.3 For full details of retention, including retention types held by Borderlands, please refer to our Data Retention Policy.

Borderlands' approach to data periods for specific personal data please refer to our Data Retention Policy.

9. Secure Processing

Borderlands shall ensure that all personal data collected, held, and processed is kept secure and protected against unauthorised or unlawful processing and against accidental loss, destruction, or damage. Further details of the technical and organisational measures which shall be taken are provided in Parts 22 to 27 of this Policy.

10. Accountability and Record-Keeping

10.1 Borderlands' trustees are responsible for overseeing the implementation of this Policy and for monitoring compliance with this Policy, Borderlands' other data protection-related policies, and with the GDPR and other applicable data protection legislation. Day-to-day data management is the responsibility of the Director as Data Manager.

10.2 Borderlands shall keep written internal records of all personal data collection, holding, and processing, which shall incorporate the following information:

10.2.1 The name and details of Borderlands, its trustees, its Data Manager and any applicable third-party data processors;

10.2.2 The purposes for which Borderlands collects, holds, and processes personal data;

10.2.3 Details of the categories of personal data collected, held, and processed by Borderlands, and the categories of data subject to which that personal data relates;

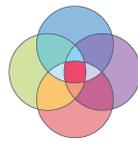
10.2.4 Details of any transfers of personal data to non-EEA countries including all mechanisms and security safeguards;

10.2.5 Details of how long personal data will be retained by Borderlands (please refer to Borderlands' Data Retention Policy);

and 10.2.6 Detailed descriptions of all technical and organisational measures taken by Borderlands to ensure the security of personal data.

11. Data Protection Impact Assessments

11.1 Borderlands shall carry out Data Protection Impact Assessments for any and all new projects and/or new uses of personal data.



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11.2 Data Protection Impact
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Assessments shall be overseen by
shall address the following:

- 11.2.1 The type(s) of personal data that will be collected, held, and processed;
- 11.2.2 The purpose(s) for which personal data is to be used;
- 11.2.3 Borderlands' objectives;
- 11.2.4 How personal data is to be used;
- 11.2.5 The parties (internal and/or external) who are to be consulted;
- 11.2.6 The necessity and proportionality of the data processing with respect to the purpose(s) for which it is being processed;
- 11.2.7 Risks posed to data subjects;
- 11.2.8 Risks posed both within and to Borderlands;
- and 11.2.9 Proposed measures to minimise and handle identified risks.

12. Keeping Data Subjects Informed

12.1 Borderlands shall provide the information set out in Part 12.2 to every data subject:

12.1.1 Where personal data is collected directly from data subjects, those data subjects will be informed of its purpose at the time of collection;

and 12.1.2 Where personal data is obtained from a third party, the relevant data subjects will be informed of its purpose:

12.1.3 if the personal data is used to communicate with the data subject, when the first communication is made;

or 12.1.4 if the personal data is to be transferred to another party, before that transfer is made;

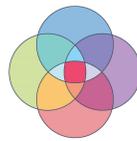
or 12.1.5 as soon as reasonably possible and in any event not more than one month after the personal data is obtained.

12.2 The following information shall be provided:

12.2.1 Details of Borderlands including, but not limited to, the identity of its Data Manager;

12.2.2 The purpose(s) for which the personal data is being collected and will be processed (as detailed in Part 21 of this Policy) and the legal basis justifying that collection and processing;

12.2.3 Where applicable, the legitimate interests upon which Borderlands is justifying its collection and processing of the personal data;



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12.2.4 Where the personal data is not obtained directly from the data subject, the categories of personal data collected and processed;

personal data is not obtained the categories of personal data

12.2.5 Where the personal data is to be transferred to one or more third parties, details of those parties;

12.2.6 Where the personal data is to be transferred to a third party that is located outside of the European Economic Area (the “EEA”), details of that transfer, including but not limited to the safeguards in place (see Part 28 of this Policy for further details);

12.2.7 Details of data retention;

12.2.8 Details of the data subject’s rights under the GDPR;

12.2.9 Details of the data subject’s right to withdraw their consent to Borderlands processing of their personal data at any time;

12.2.10 Details of the data subject’s right to complain to the Information Commissioner’s Office (the “supervisory authority” under the GDPR);

12.2.11 Where applicable, details of any legal or contractual requirement or obligation necessitating the collection and processing of the personal data and details of any consequences of failing to provide it.

13. Data Subject Access

13.1 Data subjects may make subject access requests (“SARs”) at any time to find out more about the personal data which Borderlands holds about them, what it is doing with that personal data, and why.

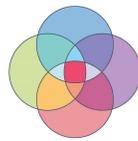
13.2 Data subjects wishing to make a SAR may do so in writing, using Borderlands’ Subject Access Request Form, or other written communication. SARs should be addressed to Borderlands’ CEO at The Assisi Centre, Lawfords Gate, Bristol BS5 0RE.

13.3 Responses to SARs shall normally be made within one month of receipt, however this may be extended by up to two months if the SAR is complex and/or numerous requests are made. If such additional time is required, the data subject shall be informed.

13.4 All SARs received shall be handled by Borderlands’ CEO.

13.5 Borderlands does not charge a fee for the handling of normal SARs. Borderlands reserves the right to charge reasonable fees for additional copies of information that has already been supplied to a data subject, and for requests that are manifestly unfounded or excessive, particularly where such requests are repetitive.

14. Rectification of Personal Data



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14.1 Data subjects have the right to require Borderlands to rectify any of their personal data that is inaccurate or incomplete.

right to require Borderlands to data that is inaccurate or

14.2 Borderlands shall rectify the personal data in question, and inform the data subject of that rectification, within one month of the data subject informing Borderlands of the issue. The period can be extended by up to two months in the case of complex requests. If such additional time is required, the data subject shall be informed.

14.3 In the event that any affected personal data has been disclosed to third parties, those parties shall be informed of any rectification that must be made to that personal data.

15. Erasure of Personal Data

15.1 Data subjects have the right to request that Borderlands erases the personal data it holds about them in the following circumstances:

15.1.1 It is no longer necessary for Borderlands to hold that personal data with respect to the purpose(s) for which it was originally collected or processed;

15.1.2 The data subject wishes to withdraw their consent to Borderlands holding and processing their personal data;

15.1.3 The data subject objects to Borderlands holding and processing their personal data (and there is no overriding legitimate interest to allow Borderlands to continue doing so) (see Part 18 of this Policy for further details concerning the right to object);

15.1.4 The personal data has been processed unlawfully;

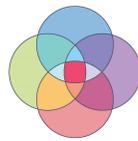
15.1.5 The personal data needs to be erased in order for Borderlands to comply with a particular legal obligation;

15.2 Unless Borderlands has reasonable grounds to refuse to erase personal data, all requests for erasure shall be complied with, and the data subject informed of the erasure, within one month of receipt of the data subject's request. The period can be extended by up to two months in the case of complex requests. If such additional time is required, the data subject shall be informed.

15.3 In the event that any personal data that is to be erased in response to a data subject's request has been disclosed to third parties, those parties shall be informed of the erasure (unless it is impossible or would require disproportionate effort to do so).

16. Restriction of Personal Data Processing

16.1 Data subjects may request that Borderlands ceases processing the personal data it holds about them. If a data subject makes such a request, Borderlands shall retain



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only the amount of personal (if any) that is necessary to question is not processed

data concerning that data subject ensure that the personal data in further.

16.2 In the event that any affected personal data has been disclosed to third parties, those parties shall be informed of the applicable restrictions on processing it (unless it is impossible or would require disproportionate effort to do so).

17. Data Portability

17.1 Where data subjects have given their consent to Borderlands to process their personal data, or the processing is otherwise required for the performance of a contract between Borderlands and the data subject, data subjects have the right, under the GDPR, to receive a copy of their personal data and to use it for other purposes (namely transmitting it to other data controllers).

17.2 To facilitate the right of data portability, Borderlands shall make available all applicable personal data to data subjects in a standard format in common use.

17.3 Where technically feasible, if requested by a data subject, personal data shall be sent directly to the required data controller.

17.4 All requests for copies of personal data shall be complied with within one month of the data subject's request. The period can be extended by up to two months in the case of complex or numerous requests. If such additional time is required, the data subject shall be informed.

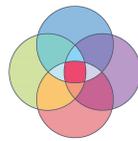
18. Objections to Personal Data Processing

18.1 Data subjects have the right to object to Borderlands processing their personal data based on legitimate interests, direct marketing (including profiling), and processing for scientific and/or historical research and statistics purposes.

18.2 Where a data subject objects to Borderlands processing their personal data based on its legitimate interests, Borderlands shall cease such processing immediately, unless it can be demonstrated that Borderlands' legitimate grounds for such processing override the data subject's interests, rights, and freedoms, or that the processing is necessary for the conduct of legal claims.

18.3 Where a data subject objects to Borderlands processing their personal data for direct marketing purposes, Borderlands shall cease such processing immediately.

18.4 Where a data subject objects to Borderlands processing their personal data for scientific and/or historical research and statistics purposes, the data subject must, under the GDPR, "demonstrate grounds relating to his or her particular situation". Borderlands is not required to comply if the research is necessary for the performance of a task carried out for reasons of public interest.



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19. Automated Decision-

Borderlands does not use decision-making processes.

Making

personal data in automated

20. Profiling

Borderlands does not use personal data for profiling purposes.

21. Personal Data Collected, Held, and Processed

The following Members personal data is collected, held, and processed by Borderlands (for details of data retention, please refer to Borderlands' Data Retention Policy):

Personal data about	Why held	Review	How long kept	Comments
All members	To record the name and relevant personal details for M&E purposes	1 year after last contact	5 years	In case they return – many members are in states of transition
Donors	To record the identity and contact details of donors, prospective donors and financial details		6 years from last donation or 2 years from last contact, whichever is longer	
Unsuccessful applicants for employment	To record applications and the process by which decisions on them are reached		Master copy of all documents kept for 1 year Other copies destroyed when decisions are made	In case of challenge from an unsuccessful candidate
Employees	Personnel records for the good management of the charity		Financial records 3 years Other records 3 years	
Volunteers	To record the identity and other details of their		5 years from the end of engagement	



	engagement with Borderlands			
Trustees	To record the identity and other details of their engagement with Borderlands		3 years from the end of engagement	
Partner organisations	Individuals' contact details		2 years from last contact	

22. Data Security - Transferring Personal Data and Communications

Borderlands shall ensure that the following measures are taken with respect to all communications and other transfers involving personal data:

22.1 All emails containing personal data must be marked “confidential”;

22.2 All emails containing personal data must have data anonymised as much as is possible and reasonable, whilst effectively working to meet the aims of Borderlands.

22.3 Personal data should be transmitted over secure networks;

22.4 Personal data may not be transmitted over a wireless network if there is a wired alternative that is reasonably practicable;

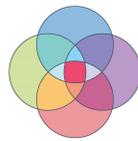
22.5 Where personal data is to be transferred in hardcopy form it should be passed directly to the recipient;

and 22.6 All personal data to be transferred physically, whether in hardcopy form or on removable electronic media shall be transferred in a suitable container marked “confidential”.

23. Data Security - Storage

Borderlands shall ensure that the following measures are taken with respect to the storage of personal data:

23.1 All electronic copies of personal data should be stored securely using passwords;



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23.2 All hardcopies of electronic copies stored on be stored securely in a locked

personal data, along with any physical, removable media should box, drawer, cabinet, or similar;

23.3 All personal data stored electronically should be backed up;

23.4 No personal data should be stored on any mobile device (including, but not limited to, laptops, tablets, and smartphones), whether such device belongs to Borderlands or otherwise for longer than is absolutely necessary; and

23.5 No personal data should be transferred to any device personally belonging to an employee or volunteer and personal data may only be transferred to devices belonging to agents, contractors, or other parties working on behalf of Borderlands where the party in question has agreed to comply fully with the letter and spirit of this Policy and of the GDPR (which may include demonstrating to Borderlands that all suitable technical and organisational measures have been taken).

24. Data Security - Disposal

When any personal data is to be erased or otherwise disposed of for any reason (including where copies have been made and are no longer needed), it should be securely deleted and disposed of.

25. Data Security - Use of Personal Data

Borderlands shall ensure that the following measures are taken with respect to the use of personal data:

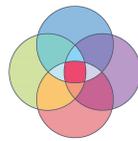
25.1 No personal data may be shared informally and if an employee, agent, sub contractor, or other party working on behalf of Borderlands requires access to any personal data that they do not already have access to, such access should be formally requested from the Data Manager;

25.2 No personal data may be transferred to any employees, agents, contractors, or other parties, whether such parties are working on behalf of Borderlands or not, without the authorisation of the Data Manager;

25.3 Personal data must be handled with care at all times and should not be left unattended or on view to unauthorised employees, agents, sub-contractors, or other parties at any time;

25.4 If personal data is being viewed on a computer screen and the computer in question is to be left unattended for any period of time, the user must lock the computer and screen before leaving it;

and 25.5 Where personal data held by Borderlands is used for marketing purposes, it shall be the responsibility of the Data Manager to ensure that the



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appropriate consent is
have opted out, whether
such as the TPS.

obtained and that no data subjects
directly or via a third-party service

26. Data Security - IT Security

Borderlands shall ensure that the following measures are taken with respect to IT and information security:

26.1 All passwords used to protect personal data should be changed regularly and should not use words or phrases that can be easily guessed or otherwise compromised. All passwords must contain a combination of uppercase and lowercase letters, numbers, and symbols;

26.2 Under no circumstances should any passwords be written down or shared between any employees, agents, contractors, or other parties working on behalf of Borderlands, irrespective of seniority or department. If a password is forgotten, it must be reset using the applicable method;

26.3 All software (including, but not limited to, applications and operating systems) shall be kept up-to-date;

and 26.4 No software may be installed on any Borderlands-owned computer or device without the prior approval of the CEO.

27. Organisational Measures

Borderlands shall ensure that the following measures are taken with respect to the collection, holding, and processing of personal data:

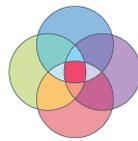
27.1 All employees, agents, contractors, or other parties working on behalf of Borderlands shall be made fully aware of both their individual responsibilities and Borderlands' responsibilities under the GDPR and under this Policy, and shall be provided with a copy of this Policy;

27.2 Only employees, agents, sub-contractors, or other parties working on behalf of Borderlands that need access to, and use of, personal data in order to carry out their assigned duties correctly shall have access to personal data held by Borderlands;

27.3 All employees, agents, contractors, or other parties working on behalf of Borderlands handling personal data will be appropriately trained to do so;

27.4 All employees, agents, contractors, or other parties working on behalf of Borderlands handling personal data will be appropriately supervised;

27.5 All employees, agents, contractors, or other parties working on behalf of Borderlands handling personal data shall be required and encouraged to exercise care,



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caution, and discretion when that relate to personal data, otherwise;

discussing work-related matters whether in the workplace or

27.6 Methods of collecting, holding, and processing personal data shall be regularly evaluated and reviewed;

27.7 All personal data held by Borderlands shall be reviewed periodically

27.8 The performance of those employees, agents, contractors, or other parties working on behalf of Borderlands handling personal data shall be regularly evaluated and reviewed;

27.9 All employees, agents, contractors, or other parties working on behalf of Borderlands handling personal data will be bound to do so in accordance with the principles of the GDPR and this Policy by contract;

27.10 All agents, contractors, or other parties working on behalf of Borderlands handling personal data must ensure that any and all of their employees who are involved in the processing of personal data are held to the same conditions as those relevant employees of Borderlands arising out of this Policy and the GDPR;

and 27.11 Where any agent, contractor or other party working on behalf of Borderlands handling personal data fails in their obligations under this Policy that party shall indemnify and hold harmless Borderlands against any costs, liability, damages, loss, claims or proceedings which may arise out of that failure.

28. Data Breach Notification

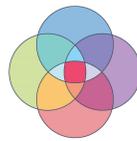
28.1 All personal data breaches must be reported immediately to Borderlands' CEO and to the Chair of Trustees.

28.2 If a personal data breach occurs and that breach is likely to result in a risk to the rights and freedoms of data subjects (e.g. financial loss, breach of confidentiality, discrimination, reputational damage, or other significant social or economic damage), the CEO must ensure that the Information Commissioner's Office is informed of the breach without delay, and in any event, within 72 hours after having become aware of it.

28.3 In the event that a personal data breach is likely to result in a high risk (that is, a higher risk than that described under Part 28.2) to the rights and freedoms of data subjects, the Data Manager must ensure that all affected data subjects are informed of the breach directly and without undue delay. 2

28.4 Data breach notifications shall include the following information:

28.4.1 The categories and approximate number of data subjects concerned;



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28.4.2 The categories
personal data records

and approximate number of
concerned;

28.4.3 The name and contact details of Borderlands' Data Manager (or other
contact point where more information can be obtained);

28.4.4 The likely consequences of the breach;

28.4.5 Details of the measures taken, or proposed to be taken, by Borderlands to
address the breach including, where appropriate, measures to mitigate its
possible adverse effects.

References

<https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/>