



Data Protection Policy

Adopted by Trustees – 07 July 2026

1. Introduction

Cambridge Carbon Footprint (CCF) needs to collect and use information about individuals with whom it comes into contact, in order to carry out its work. This personal information must be collected and dealt with appropriately, whether it is collected on paper, stored in a computer database, or recorded on other material.

To this end, CCF will adhere to the General Data Protection Regulation 2018, and specifically, its six Principles of:

- i. lawfulness, fairness and transparency
- ii. purpose limitation
- iii. data minimization
- iv. accuracy
- v. storage limitation
- vi. integrity and confidentiality

2. Data Controller

Cambridge Carbon Footprint [Charity no. 1127376, and Cambridge Carbon Footprint Ltd, Company No: 05750297] is the "Controller" under the terms of the Regulation. It has determined that it will only hold and use personal information for the purposes of:

- i. establishing or maintaining involvement with CCF, or support for it
- ii. providing or administering CCF activities
- iii. recruitment and employment of staff
- iv. sending newsletters to subscribers

3. Disclosure

Disclosures of CCF's personal data are restricted to those third parties that are necessary for the purposes in (2), other than those made with the informed consent of the data subject. Where necessary for the purposes in (2) CCF may share data with trusted third parties including service providers (e.g., email platforms,) under written agreements ensuring GDPR compliance. Data will not be sold or shared for commercial purposes.

Commented [K01]: Expand a little -Where necessary for the purposes in (2) CCF may share data with trusted third parties including service providers (e.g., email platforms,) under written agreements ensuring GDPR compliance. Data will not be sold or shared for commercial purposes.

4. Data Collection

CCF will ensure that personal data is only collected for the purposes in (2) and will observe fully conditions regarding the fair collection and use of information.

When collecting data about individuals, CCF will ensure that they:

- i. clearly understand why the information is needed
- ii. understand what it will be used for and what the consequences are should they decide not to give consent to processing
- iii. as far as reasonably possible, grant explicit consent, either written or verbal for data to be processed

5. Data Storage

Information and records will be stored securely and will only be accessible to authorised staff and volunteers.

Information will be stored for only as long as needed (eg 3 years after last volunteer activity and 6 years after a donation to ensure financial compliance for donor records) and will be disposed of appropriately. It will not be kept after the relationship between CCF and the data subject ends, unless (and for so long as) it is necessary to do so for the purposes in (2).

It is CCF's responsibility to ensure all personal data is non-recoverable from any computer system previously used within the organisation, which has been passed on/sold to a third party.

Commented [K02]: Charity commission guidance wants clear retention rules. The keep for as long as necessary can be added to by simply adding the retention period explicitly, I believe the standard is Volunteer records - 3 years after last activity Donor records - 6 years for financial compliance.

6. Data Access and Accuracy

All individuals have the right to access information CCF holds about them. CCF will, through appropriate management and procedures:

- i. ensure people, about whom information is held, can:
 - a. access their personal information
 - b. correct, rectify, block or erase any incorrect information about them
- ii. respond to these requests promptly and courteously.
- iii. ensure the quality of information used and take reasonable steps to keep it up to date by asking data subjects whether there have been any changes
- iv. take appropriate technical and organisational security measures to safeguard personal information

Information requests should be directed to CCF Data Protection Officer, Siobhan Mellon, General Manager siobhan@cambridgecarbonfootprint.org

Commented [K03]: State here who to contact for this for clarity, ie Requests should be directed to CCF Data Protection Officer, Siobhan Mellon, General Manager siobhan@cambridgecarbonfootprint.org

7. Operation

CCF will ensure that:

- i. it has a Data Protection Officer with specific responsibility for ensuring compliance with this Data Protection Policy and related procedures.
- ii. everyone processing personal information understands that they are responsible for following good data protection practice
- iii. everyone processing personal information is appropriately trained to do so and supervised
- iv. it regularly reviews the ways it holds, manages and uses personal information
- v. all staff are aware that a breach of the rules and procedures identified in this policy may lead to disciplinary action being taken against them

8. Reviewing and monitoring

This policy will be reviewed annually, or sooner if required, by Trustees to

- i. reflect best practice
- ii. ensure compliance with any amendments to the GDPR 2018
- iii. reflect relevant changes in CCF's operations.

Any suspected data breach must be reported immediately to the Data Protection Officer. CCF will notify the ICO within 72 hours where required and inform affected individuals if there is a high risk to their rights.

In case of queries in relation to this policy, please contact the CCF Data Protection Officer Siobhan Mellon, General Manager siobhan@cambridgecarbonfootprint.org.

End