



Data Protection Policy

September 2026

Date for review: September 2029

***“At Penrith and Eden Refugee Network we respect privacy
and look after data responsibly”***

Your personal data

Personal data is any data that relates to an identified or identifiable living individual. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession. The processing of personal data is governed by the General Data Protection Regulation (the GDPR).

Who we are

Penrith and Eden Refugee Network (PERN) is the data controller (contact details below). This means it decides how your personal data is processed and for what purposes.

How do we process your personal data?

PERN complies with its obligations under the GDPR by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

We use your personal data for the following purposes:

- To enable us to provide services for the benefit of the public as specified in our constitution;
- To administer membership records;
- To manage our employees and volunteers;
- To maintain our own accounts and records;

- To inform you of news relating to and events and activities run by PERN.

Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available.

What is the legal basis for processing your personal data?

- Explicit consent of the data subject so that we can keep you informed about PERN news, events, activities, campaigning and services;
- Processing is necessary for carrying out legal obligations in relation to Gift Aid or under employment, social security or social protection law;
- Processing is carried out by PERN in accordance with the aims set out in its constitution provided:
 - a) the processing relates only to members or former members (or those who have regular contact with it in connection with those purposes);
 - b) there is no disclosure to a third party without consent.

Data minimisation

PERN shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

Sharing your personal data

Your personal data will be treated as strictly confidential. PERN will only share your data with third parties for specific activities with your consent.

Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of your personal data which PERN holds about you;
- The right to request that PERN corrects any personal data if it is found to be inaccurate or out-of-date;
- The right to request your personal data is erased where it is no longer necessary for PERN to retain such data;
- The right to withdraw your consent to the processing at any time;
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable) [Only applies

where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics]

- The right to complain to PERN about its use of data it holds about you
- The right to complain to the Information Commissioner's Office (ICO).

Further processing

If PERN wishes to use your personal data for a new purpose, not covered by this Data Protection Policy, then it will provide you with a new policy explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, PERN will seek your prior consent to the new processing.

Accuracy

PERN shall take reasonable steps to ensure personal data is accurate. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

Security

PERN shall ensure that personal data is stored securely using modern software that is kept up to date. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information. When personal data is deleted this should be done safely such that the data is irrecoverable. Appropriate back-up and disaster recovery solutions shall be in place.

Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, PERN shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO.

Contact Details and Complaints

If you have a data protection complaint, please contact us. We will acknowledge your complaint within 5 days and investigate it without undue delay, in compliance with the Data (Use and Access) Act 2025 and ICO guidance.

- Complaints can be submitted verbally (phone, in person) or in writing (email, letter). PERN's administrator can be contacted at telephone 07964256397 (if no-one replies to the telephone, please leave a message and we will call you back). The email address is:

hello@pern.org.uk or you can write a letter to PERN at Mostyn Hall, Friargate, Penrith, Cumbria CA11 7XR.

- If verbal, the staff member should record the complaint in writing immediately.
- Complaints can be raised by an individual or a representative with proper authorisation (e.g., Power of Attorney or signed Letter of Authority).
- All complaints are handled confidentially. Only staff involved in the investigation and resolution have access to the details.
- Following review and investigation, we will provide a written outcome, including any actions taken or planned.
- If the complainant remains dissatisfied, they may request a review by the board of trustees or escalate to the Information Commissioner's Office for data protection complaints.
- We will keep a log of data protection complaints, in line with our complaints policy, to help identify patterns and demonstrate compliance with legal obligations.

You can contact the Information Commissioner's Office on 0303 123 1113 or via email (<https://ico.org.uk/global/contact-us/email/>) or at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF