

# Noa's Place CIO - Data Protection & Privacy Policy

## 1. Introduction and Purpose

Noa's Place CIO is committed to protecting the privacy and security of personal information. This policy explains how we collect, use, store, and protect personal data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. We process personal data fairly, lawfully, and transparently, respecting the neurodivergent and disabled community we serve.

## 2. Data Protection Principles

We adhere to the principles of data protection as set out in the UK GDPR. Personal data shall be:

- Processed lawfully, fairly, and in a transparent manner.
- Collected for specified, explicit, and legitimate purposes.
- Adequate, relevant, and limited to what is necessary for the purposes for which it is processed.
- Accurate and, where necessary, kept up to date.
- Kept in a form which permits identification for no longer than is necessary.
- Processed in a manner that ensures appropriate security, including protection against unauthorized or unlawful processing and against accidental loss, destruction, or damage.

## 3. What Information We Collect

- Service Users: Name, contact info, DOB, and emergency contacts.
- Special Category Data: Information regarding disabilities, health conditions, or sensory needs. This is collected to provide safe, tailored support and is only processed with explicit consent.
- Supporters/Donors: Contact details and donation history.
- Staff/Volunteers: Recruitment info, DBS checks, and bank details.
- Visitors: Name and contact details for health, safety, and fire regulations.
- Media: Photographs or video footage from events (subject to specific consent).

## 4. How We Use Your Information (Lawful Basis)

- Consent: For newsletters and processing special category support data.
- Legitimate Interest: For day-to-day administration and volunteer management.
- Legal Obligation: For safeguarding, HMRC/Gift Aid, and RIDDOR reporting.

## 5. Data Storage and Security

- Digital data is stored on secure, password-protected systems.
- Physical records are kept in locked cabinets.

- Access is restricted to authorized personnel on a 'need-to-know' basis.

## **6. Data Sharing**

We do not sell data. We share with:

- Statutory agencies (e.g., Social Care, Police) if required for safeguarding.
- Funders (usually anonymized/aggregated).
- Service providers (e.g., payroll) under strict contracts.

## **7. Your Data Protection Rights**

You have the right to access, rectify, erase, restrict, or object to the processing of your data, and the right to data portability. Contact us to exercise these.

## **8. CCTV & Media**

If CCTV is in operation for safety at our hub, signs will be clearly displayed. Photos/videos for social media or marketing are only taken and used where clear, affirmative consent has been provided.

## **9. Accessibility**

To ensure our policy is inclusive, an 'Easy Read' summary of this document is available upon request for those with communication or cognitive processing differences.

## **10. Contact and Complaints**

The Board of Trustees has overall responsibility. The Charity Founder acts as the Data Protection Lead.

Email: [hello@noasplace.org.uk](mailto:hello@noasplace.org.uk)

Regulator: Information Commissioner's Office (ICO) - [www.ico.org.uk](http://www.ico.org.uk)

ICO registration number: ZC109479

## **10. Policy Review**

This policy will be reviewed annually by the Board of Trustees.

Date of Policy Adoption: [19/11/2025]

Date for Next Review: [19/11/2026]