



GS8 Green Synergy Data Breach Policy

Purpose of the Policy

Green Synergy is committed to ensuring that the organisation's management of a data breach policy framework is inclusive, responsive, robust and accountable. The organisation believes that sound policies are required in the defining the policy and procedures to be followed in the event of a data breach. This will significantly benefit the overall efficiency of the operations for Green Synergy and promote the best interests of its service users, employees, volunteers, Trustees, members, partners / stakeholders and voluntary officers.

Statement of Policy – This policy defines Green Synergy's policy in the event of a data breach and should be read in conjunction with GS7 Green Synergy Data Protection Policy and GS7a Green Synergy Privacy Statement. The policy forms part of Green Synergy's internal and external service delivery principles and the charity's internal governance management and arrangements and is in accordance with the Charities Commission England and Wales.

Policy Principles – Green Synergy needs to ensure that certain information about members, staff, Trustees, volunteers and beneficiaries that we come into contact is secure and securely managed. As Green Synergy works with a wide range of people including children and young people, the organisation needs to be especially careful about protecting their data as they will be less aware of the risks to people holding and processing their data.

A key principle of the policy is to ensure the confidential, lawful and correct treatment of personal data. It is also necessary to process information so that team members can be recruited, projects organised and legal obligations to funding bodies and government bodies complied with.

To comply with the law, information must be collected and used fairly, stored safely and not disclosed to any other person unlawfully. To do this, Green Synergy must comply with the Data Protection Principles set out in the Data Protection Act 1998 (the 1998 Act), and 2018 Act, any subsequent amendments and the General Data Protection Regulation (GDPR). It fully endorses and adheres to the principles of data protection.

In the Event of a Data Breach

A personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. This includes breaches that are the result of both accidental and deliberate causes. It also means that a breach is more than just about losing personal data.

Personal data breaches can include:

- access by an unauthorised third party

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Green Synergy. 49 Roman Pavement, Lincoln, Lincolnshire. LN2 5RD. Tel: 01522 533077

Charity Number: 1153883 Company Number: 08399741

Email: info@greensynergy.org.uk Web: www.greensynergy.org.uk



- deliberate or accidental action (or inaction) by a controller or processor
- sending personal data to an incorrect recipient
- computing devices containing personal data being lost or stolen
- alteration of personal data without permission; and
- loss of availability of personal data.

Any action which compromises the confidentiality, integrity or availability of personal data is classed as a data breach whether accidental or deliberate.

In the event of a data breach relating to staff or members of the public, you must contact the data controller or at the very least within 24 hours. The Data Controller for Green Synergy is the CEO on 01522 533077 IMMEDIATELY.

As the Data Controller, the CEO will then have to assess the risk to the person whose data has been lost/shared and may have to contact the Information Commissioners Office (ICO).

It will be the responsibility of the Data Controller to establish the likelihood and severity of the resulting risk to people's rights and freedoms and look at the impact the breach of data may have on them such as emotional distress, and physical and material damage.

If it is likely that there will be a risk, then the data controller must notify the ICO within 72 hours. If it is unlikely then they don't have to report it. However, if Green Synergy decide not to report the breach, they will need to be able to justify this decision, so the breach will be documented.

When reporting a breach, the GDPR legislation requires the following information to be provided:

- a description of the nature of the personal data breach including, where possible:
 - the categories and approximate number of individuals concerned; and
 - the categories and approximate number of personal data records concerned.
 - the name and the contact point where more information can be obtained (CEO)
 - a description of the likely consequences of the personal data breach; and
 - a description of the measures taken, or proposed to be taken, to deal with the personal data breach, including, where appropriate, the measures taken to mitigate any possible adverse effects.

Data Security Online

Third Party Product Providers that Green Synergy work in association with.

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Green Synergy work closely with a number of third-party product providers supplying a range of products and service. Our main provider is NamesCo who hosts the charity's website and JSM Computers who oversees the IT networks.

When donors are using the charity's secure online donation pages, their donation is processed by a third-party payment processor, who specialises in the secure online capture and processing of credit/debit card transactions. If there are any questions regarding secure transactions, please contact us at info@greensynergy.org.uk

Green Synergy may transfer individual's personal information to a third party as part of a sale transaction of some or all of our business and assets to any third party or as part of any business restructuring or reorganisation, or if we're under a duty to disclose or share their personal data in order to comply with any legal obligation or to enforce or apply our terms of use or to protect the rights, property or safety of our supporters and customers. However, Green Synergy will take steps with the aim of ensuring that individual's privacy rights continue to be protected.

Use of 'cookies'

Like many other websites, the Green Synergy website uses cookies. 'Cookies' are small pieces of information sent by an organisation to a computer and stored on the hard drive to allow that website to recognise that device when it visits the website. They collect statistical data about the browsing actions and patterns and do not identify the actual individual. For example, the charity's website uses cookies to store the country preference. This helps us to improve our website and deliver a better more personalised service.

It is possible to switch off cookies by setting individual's browser preferences. For more information on how to switch off cookies on a computer, visit our full cookies policy. Turning cookies off may result in a loss of functionality when using our website.

Links to other websites

Green Synergy website may contain links to other websites run by other organisations. This privacy policy applies only to our website, so we encourage individuals to read the privacy statements on the other websites that are visited. The organisation cannot be responsible for the privacy policies and practices of other sites even if they are accessed using links from our website.

In addition, if individual's have linked to our website from a third-party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and recommend that the policy of that third party site is checked.

If a Data Processor Breach occurs with our data processors

Green Synergy use 2 main data processors. NamesCo hosts Green Synergy website and Microsoft hosts our 365 online file storage cloud. If a breach occurs to one of these services and they suffer a breach,

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they must inform Green Synergy without undue delay as soon as it becomes aware. Green Synergy in turn must follow our own breach protocols, assess the risk to individuals and potentially inform them and the ICO.

Review date: 26/08/2027

Related Documents:

- GS7 Green Synergy Data Protection Policy
- GS7a Green Synergy Privacy Statement
- GS10 Green Synergy IT Management and Security Policy

Document Control:

Policy Details			
Policy	GS8 Green Synergy Data Breach Policy		
Version	Date of Review	Reviewed by	Approval
V1	21.09.2022	CEO	Trustee Basecamp process
V2	04.01.2023	Treasurer / CEO	Trustee Basecamp process
V3	20.09.2023	CEO	Trustee Basecamp process
V4	17.09.2024	CEO	Trustee Google Drive Governance Portal
V5	12.09.2025	CEO	Trustee Google Drive Governance Portal
V6	26.08.2026	CEO	Trustee Google Drive Governance Portal

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