

## Privacy Policy Statement

The ICE Benevolent Fund site does not automatically capture or store personal information, other than logging the user's IP address and session information such as the duration of the visit and the type of browser used. This is recognised by the Web server and is only used for system administration and to provide important statistics which the Benevolent Fund draws on to evaluate use of the site.

We do not use cookies for collecting user information from the site. You may be asked for personal information if you want to take advantage of specific services we offer or if you wish to apply for financial assistance. In each case we will only use the personal information you provide to deliver the services you have told us you wish to take part in.

The privacy policy only covers the ICE Benevolent Fund's website at [www.icebenfund.com](http://www.icebenfund.com). The links provided within this site to other websites are not covered by this policy.

### Summary of terms:

**Browser:** Used to locate and display Web pages via a software application. The most popular ones are Netscape Navigator and Microsoft Internet Explorer.

**Cookie:** Message given to a web browser by a web server. The message is then stored by the browser in a text file called cookie.txt. Each time the browser requests a page from the server, this message is sent back. A cookie's main objective is to identify users and personalise their visit by customising web pages for them for example by welcoming them by name next time they visit the same site. A site using cookies will usually invite you to provide personal information such as your name, e-mail address and interests.

**IP (Internet Protocol):** All networks connected to the internet speak IP, the technical standard which allows data to be transmitted between two devices.

TCP/IP (Transmission Control Protocol/Internet Protocol) is responsible for making sure messages get from one host to another and that the messages are understood.

**IP address:** If you are connected to the Internet you have one, for example it may look something like this 198.184.98.9

**Web Server:** Delivers (serves up) web pages to your computer.



POLICY

## Data Protection Policy

The Data Protection Act 1998 (“the Act”) implementing EC Directive 95/46 came into force on 1 March 2000 and introduced new rules governing how virtually any personal information relating to individuals (“data subjects”, which includes members, employees, contacts and customers) can be collected, stored, transferred etc. by companies, organisations and individuals (“data controllers”) such as ICE Benevolent Fund. Failure to comply with the terms of the Act can result in hefty fines and even the commission of criminal offences.

ICE Benevolent Fund needs to obtain and use information on individuals in order to operate successfully. ICE Benevolent Fund’s Data Protection Policy has been adopted to establish good data protection practices, increase general awareness of data protection issues and prevent staff from inadvertently breaching provisions of the Act. It will be applied by the ICE Benevolent Fund to all its activities.

ICE Benevolent Fund’s Data Protection Officer is Mrs Kris Barnett (Tel: 01444 417979 / email: kris.barnett@icebenfund.com). Any queries regarding the charity’s Data Protection Policy should be addressed to her.

### Personal Data Processed by ICE Benevolent Fund

Data protection issues apply not only to relevant computer systems and programmes, but also to all the ICE Benevolent Fund’s records (including structured paper filing systems) if they contain personal information about an individual.

The ICE Benevolent Fund maintains a wide range of data (including manual data) on members and their families, including personal and financial information, professional history, engineering specialisms, professional development and interests where notified. This information will be stored securely and processed lawfully for the following purposes:

#### **ICE Benevolent Fund — Trustees / ICE Members / Visitors/ ICE Benevolent Fund Members**

Posting and e mailing relevant meeting papers and publications, renewal of annual membership and subscription payment, details of visits and next of kin notices, AGM notices, proxy forms, fundraising appeals, etc.

#### **ICE Benevolent Fund Beneficiaries**

Assessment and processing for benevolence, grant payments and other benevolent gifts, posting and emailing correspondence and publications. This information may be accessed, reviewed and used by the Trustees, the Ben Fund’s staff and Ben Fund’s visitors for the purposes of assessing benevolence and to related third parties for assessing financial needs and employment support if appropriate. This information may also be used to calculate entitlement to state benefits.



## Data Protection Principles

All personal data must be dealt with in accordance with the eight data protection principles set out in the Act, which are shown below with issues arising.

All data must be processed fairly and lawfully.

1. All personal information must be obtained by the ICE Benevolent Fund in a way that does not deceive or mislead data subjects as to how their information will be used. All Data subjects must see a copy of the Data Protection Policy. New applicants to the ICE Benevolent Fund are asked to confirm that they have read and understood the ICE Benevolent Fund's Data Protection Policy. ICE Benevolent Fund's Members, Visitors and Trustees will be asked to sign a consent form for their data to be stored and processed.

All data must be obtained and processed only for specified and limited purposes.

2. The ICE Benevolent Fund can only process personal data in a manner consistent with the purposes for which it was obtained. It must not be used for any other purpose beyond this without offering the data subject an "opt-out" from further communication.

All data must be adequate, relevant and not excessive in relation to such purpose.

3. The ICE Benevolent Fund will not obtain any surplus or unnecessary personal data from a Data subject. All personal data will be screened and assessed- is this information really required? Aside from compliance with data protection legislation, it is good working practice to keep only the minimum amount of information necessary for the ICE Benevolent Fund to operate efficiently.

All data must be accurate and where necessary, updated.

4. All data held by the ICE Benevolent Fund will be accurately recorded and kept up to date. If personal data held by the ICE Benevolent Fund is incorrect or has changed, all records and files should be updated as soon as possible. It is acceptable to annotate any incorrect or misleading information to indicate the inaccuracy (or any challenge to the accuracy) rather than amending the original text – if in doubt contact the Data Protection Officer.

All data must not be kept for longer than necessary.

5. Data should be reviewed regularly to weed out any redundant information which is no longer required, e.g. Beneficiary files should be shredded after the cessation of benevolence. Financial records should be destroyed up to 12 years after expiry.

All data must be processed in accordance with the rights of data subjects.

6. These include the following rights: to be informed of what processing is being undertaken, to inspect personal data and even to prevent processing in certain circumstances (see section on data subjects' rights below).

All data must be kept securely to avoid accidental loss, destruction or damage to personal data.



7. The ICE Benevolent Fund is obliged to take appropriate organisational and technical measures to keep all personal data secure.

To prevent personal data being tampered with or lost:

Personal information will not be left unattended on a computer screen;

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Desks will be kept clear. Personal information will not be left lying around;

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All communications containing personal data (both internal and external) will be secure (sealed envelopes) and/or password protection for e-mailed documents;

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Personal information no longer required should be disposed of in a secure way e.g. shredded or designated "secure" refuse. Any "old" equipment such as redundant computers should be "cleaned" before being disposed of; and,

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All beneficiary files should be kept in a locked drawer.

All data must not be transferred out of the European Economic Area ("EEA") without appropriate safeguards.

8. We recognise that personal data needs to be treated with particular care in countries which do not have reciprocal data protection laws.

We will not transfer personal data outside the EEA without an individual's consent.

## Rights of Data Subjects

Data subjects are given substantial new rights under the Act. It is therefore vital that all requests and enquiries from data subjects are logged and reported to the Data Protection Officer as soon as possible. An individual may be entitled to see what has been recorded about them.

If a data subject makes a written request (phone requests are not acceptable) to the ICE Benevolent Fund Data Protection Officer on payment of a £10 fee, they are entitled to be told (as soon as possible and within 40 days of the request at the very latest) whether their personal data is being held or processed by the ICE Benevolent Fund. Data subjects are also entitled to get copies of data held on them and information concerning the source of the data, the purposes for which it is being processed and the identity of any likely recipients of the data.

Before disclosing any information, the ICE Benevolent Fund, must have taken reasonable steps to ascertain that the request is genuinely from the data subject. Generally, responding to the individual's address as it appears in the ICE Benevolent Fund records will be acceptable. However, any suspicions about a request should be forwarded to the Data Protection Officer.



All responses to data subject requests must be made in a permanent (normally paper) form and need to be “understandable” (i.e. any codes or abbreviations used must be explained or the appropriate keys supplied).

Data subjects can require ICE Benevolent Fund to cease (or even not begin) processing personal data in certain circumstances by sending a notice to the ICE Benevolent Fund. They can do this where such processing is:

causing or likely to cause unwarranted and substantial damage or distress to the data subject or another person (provided he / she gives an explanation of why this is the case); or

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to be used for the purposes of direct marketing (sending unsolicited advertising or marketing material to him).

All requests to cease processing personal data should immediately be reported to the Data Protection Officer – Kris Barnett (kris.barnett@icebenfund.com).

## **Other Issues**

ICE Benevolent Fund’s Data Protection Officer will deal with all registration issues and communications with regulators.

