

Data Protection

Act 1998



In order to comply with the Data Protection Act 1998, the ICE Benevolent Fund draws to your attention our storing and processing of the information provided by you.

ICE Benevolent Fund's Data Protection Officer is Mrs Kris Barnett (Tel: 01444 417 979 / email: kris.barnett@icebenfund.com). Any queries regarding ICE Benevolent Fund's Data Protection Policy should be addressed to her.

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Personal Data Processed by ICE Benevolent Fund

Data protection issues apply not only to relevant computer systems and programmes but also to all ICE Benevolent Fund 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 / ICE Benevolent Fund 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 e-mailing correspondence and publications. This information may be accessed, reviewed and used by the Trustees, the ICE Benevolent Fund's staff and ICE Benevolent 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 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 ICE Benevolent Fund are asked to confirm that they have read and understood ICE Benevolent Fund's Data Protection Policy. ICE Benevolent Fund Members, Visitors and Trustees will be asked to sign a consent form for their data to be stored and processed.

Registered office:
5 Mill Hill Close
Haywards Heath
West Sussex RH16 1NY

Limited Company
registered in England
No. 6708655

Charity registered in
England & Wales
No. 1126595

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

- 2 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 ICE Benevolent Fund will not obtain any surplus or unnecessary personal data from a Data subject. All personal data will be screened and assessed i.e. 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 ICE Benevolent Fund to operate efficiently.

All data must be accurate and, where necessary, updated

- 4 All data held by ICE Benevolent Fund will be accurately recorded and kept up to date. If personal data held by 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 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;
- Desks will be kept clear. Personal information will not be left lying around;
- All communications containing personal data (both internal and external) will be secure (sealed envelopes) and/or password protection for e-mailed documents;
- 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
- 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 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, 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 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
- 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.

