

DATA PROTECTION POLICY

Version	Updated by	Date Reviewed	Approved by	Next Review
2	Claire Edwards	July 2025	Sue Fortune	July 2027



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Introduction

Lincolnshire Community Foundation CIO (LCF) complies with all aspects of current UK and European General Data Protection regulation, specifically Data Protection Principles 1-8: Personal Data is processed fairly and lawfully; will only be used for specified lawful purposes; is adequate, relevant and not excessive; is necessary and up to date; is kept for no longer than is necessary; is processed in accordance with the rights of 'data subjects'; appropriate measures are in place to ensure it is not processed unlawfully or without authorisation; data is not transferred to a territory outside the 'European Economic Area'.

Data Controller

The Data Controller is the CEO at Lincolnshire Community Foundation CIO, 4 Mill House, Carre Street, Sleaford, Lincolnshire NG34 7TW. On written request from a 'data subject', they will supply details of what data is held, why it is held and to whom it may be disclosed. LCF can also supply a copy of the relevant Data Record.

What Personal Data do we hold

We keep general information, like address and contact details, about people and groups: employees, volunteers, donors, applicants etc. Specific information might include, for example, bank details, personal references and the legal status of groups.

What is the purpose of holding Personal Data

General information is used for purposes to ensure that due diligence is carried out, to safeguard the assets and reputation of the LCF like deciding whether or not an application for funding meets eligibility criteria, statistical analysis, reports to donors and keeping standard business records. More sensitive data is processed only in response to a legal obligation and with the explicit consent of the 'data subject'.

Safeguards

Electronic data, such as online grant applications, are held in a password-protected database to which only LCF staff have access. Manual data is held in files in a secure cabinet within a locked office. Data will be secured within a password protected document where it is to be transferred electronically.

We adhere to the '**Fair Data Code**' whereby the 'data subject' will not be misled or deceived in any way. Subjects have a right to know what data we hold for what purpose and any other information pertinent to the fair processing of data.

As part of our digital grant management, we use an external AI-powered platform called Plinth. This platform allows us to manage applications more efficiently and ensures that data is securely stored in line with data protection requirements. In the course of due diligence, applicants may be asked to provide confidential supporting documents (e.g. proof of identity, safeguarding policies, bank statements, or governing documents). These documents are stored securely on Plinth's servers, which meet recognised UK data security standards. They are retained for up to six years, unless a request is made by Lincolnshire Community Foundation to delete them earlier.



Direct Marketing

Any direct marketing is carried out adhering to the Data Protection direct-marketing-checklist.

Review

This Policy was reviewed in July 2025 using the General Data Protection Data Protection Principles 1-8 and we believe our current systems and processes adhere to the new guidance. Further guidance can be found on the ICO's website <https://ico.org.uk/for-organisations/charity>