

Overseas Fellowship of Nigerian Christians



OFNC Data Collection and Storage Policy



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1.0 Introduction

Overseas Fellowship of Nigerian Christians (OFNC) as a charity organisation is committed to a policy of protecting the rights and privacy of individuals. We have put in place policies and procedures and controls to protect your privacy in accordance with the GDPR requirements.

1.2 Responsible Officer

This policy shall be under the direct responsibility of the Data Protection Officer.

1.3 Privacy and Security

The collection, storage and sharing of information will comply with established rules and legislation, including the Data Protection Act (1998) and the General Data Protection Regulation and will be read alongside the OFNC constitution and other relevant policies.

1.4 Fitness for Purpose

Only data and information which is necessary and useful for purpose will be collected by the responsible or designated officer.

1.5 Efficiency and effectiveness

The collection and storage of data and information will be time and cost efficient, planned and coordinated across the OFNC within the life cycle of a project or program.

Where possible, data will be standardised, with consistent and common definitions to facilitate information sharing.

Duplication and gaps in data collection and storage will be identified and addressed.

1.6 Transparency and interpretability

Data will be collected and stored with appropriate metadata to accurately define and describe it.

1.7 Information Sharing

Information will not be shared unless where necessary in accordance with the law or to facilitate OFNC activity. Unless where the OFNC is compelled by any law to share

information with a regulatory authority, consent of the data subject will always be sought before information is shared. In instances where information is shared with the relevant law enforcement or regulatory authority, the data subject shall be made aware where necessary.

1.8 Required knowledge and expertise

OFNC NEC members, BEC members, volunteers and staff handling data and information will be provided with training regarding the collection, handling, use and disclosure of information to which they have access as well as relevant policies and procedures.

They will have access to the skills and tools to manage, manipulate, analyse and report on the data to which they have access.

1.9 Access

The OFNC will respect the rights of individuals to access their personal information held by the OFNC or withdraw their consent for the organisation to continue to hold or use their data.

1.10 Consent

Consent of the data subject used in this policy shall imply any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to them as stipulated Under article 4(11) of GDPR

Where and when the OFNC obtains or would need to obtain data from a person below the age of 16 years, consent from a responsible adult, will be sought by the designated officer before such data is stored, used or shared. The purpose for collection, storage and use of such data shall be made clear in all instances irrespective of the data subject.

1.11 Data storage, retention and destruction

OFNC shall store and maintain a cloud-based and centralised database of all members.

Any data collected on behalf of the OFNC will be stored in designated OFNC equipment, including computers, storage devices, cloud devices, etc. Data stored on behalf of the OFNC will also be protected with adequate security and passwords as may be relevant to the storage device or media. The storage of OFNC data alongside private data is not permitted.

Data collected by the OFNC will be held for the maximum duration as would be required for regulatory compliance and a maximum of 6 years after the data ceases to be in use. Consent

of the data subject will thereafter be sought should the OFNC see the need to continue to hold this data – a fresh consent will “reset” the time for such data.

Upon expiry of any data held by the OFNC, unless a fresh consent is sought and obtained, such will be deleted in all format held by the OFNC. A register of data destroyed will be maintained centrally by the Data Protection Officer.

1.12 Right to Withdraw

Without prejudice to Article 7(3) of the GDPR, it is a policy of the OFNC that the data subject shall have the right to withdraw their consent for the OFNC to hold their data at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

1.13 Effect

This policy will be reviewed every 3 years, or whenever new rules or regulations dictate, whichever comes first.

