



GDPR Policy

Including specific Child Protection Policy

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Introduction

This document incorporates both EU and UK GDPR policy and is a working document that is continually updated. We will update our policy to meet the most recent guidance without notice.

7 Gen Analytics Limited is GDPR ready

At 7 Gen Analytics Limited, nothing to us is more important than the success of our customers and the protection of their personal data. With this in mind, we have built 7 Gen Analytics to adhere to the General Data Protection Regulation (GDPR). GDPR expands the privacy rights granted to European individuals and requires certain companies that process the personal data of European individuals to comply with a new set of regulations. In particular, GDPR applies to companies that process the personal data of European individuals and have a presence in the EU (e.g. offices or establishments) and to companies that do not have any presence in the EU but target the European market (e.g. by offering goods or services to the European market) or monitor the behaviour of European individuals.

What is GDPR?

In 2016, the European Union (EU) approved a new privacy regulation called the General Data Protection Regulation commonly known as GDPR. It's a mandatory ruling that applies to all companies that collect the data and information of EU individuals and meet certain territorial requirements. GDPR is designed to strengthen the security and protection of personal data in the EU, as well as provide businesses with a structured framework on how to collect, process, use, and share personal data. Under GDPR, the concept of "personal data" is very broad and covers almost any information relating to a specific individual.

Definitions

Personal data is information about a person which is identifiable as being about them. Examples can be found in the FAQ's.

It can be stored electronically or on paper, and includes images and audio recordings as well as written information.

Data protection is about how we, as an organisation, ensure we protect the rights and privacy of individuals, and comply with the law, when collecting, storing, using, amending, sharing, destroying or deleting personal data.

Responsibility

Overall and final responsibility for data protection lies with the management committee, who are responsible for overseeing activities and ensuring this policy is upheld.

All volunteers are responsible for observing this policy, and related procedures, in all areas of their work for the group.

When did these regulations become enforced?

All companies collecting or processing the personal data of EU individuals were required to be GDPR compliant by May 25, 2018

Controllers and Processors

The GDPR defines and distinguishes between two types of parties and responsibilities when it comes to collecting and processing personal data: data controllers and data processors. A data controller determines the purposes and ways that personal data is processed, while a data processor is a party that processes data on behalf of the controller. That means that the controller could be any company or organization. A processor could be a SaaS, IT or other company that is actually processing the data on behalf of the controller. 7 Gen Analytics is both a Data Controller and Processor. 7 Gen Analytics customers (the organisations who use 7 Gen Analytics) are Data Controllers. As a controller 7 Gen Analytics is responsible to make sure that all processors with whom it deals will be GDPR compliant and the processors themselves must keep records of their processing activities.

Our Commitment to You and the Protection of Your Data

We're committed to helping 7 Gen Analytics customers and users understand, and where applicable, comply with the General Data Protection Regulation.

GDPR introduces new or additional obligations on all organisations that handle EU citizens' personal data, regardless of where the organisations are located. In this document, we explain how we help our customers comply with the GDPR.

- 7 Gen Analytics & GDPR Compliance
- Security Infrastructure Standards and Certifications
- Updates

7 Gen Analytics & GDPR Compliance

The GDPR's updated requirements are significant and our team has ensured that all 7

Gen Analytics' product offerings, operations and contractual commitments help customers comply with the regulations and will continue to ensure they keep in line continuously. As part of 7 Gen Analytics' GDPR compliance we've taken the following steps:

- Ensuring our security infrastructure and certifications are up to date.
- Compliance with relevant contractual terms.
- Ensured that our security infrastructure and practices, data encryption in transit and at rest, backup, logs and security alerts have been built to best practice and to industry standards.
- Ensured that any data which may be stored or processed is processed and managed according to GDPR instructions.
- Delete or anonymise analytics data of users after user's deletion
- 7 Gen Analytics has the appropriate contractual terms in place within our Customer Contract, to perform our role as a data processor/controller for our customers while complying with the GDPR.
- 7 Gen Analytics has put in place internal policies, procedures, processes and controls and recurring training sessions for the team, to ensure our on-going compliance with GDPR
- 7 Gen Analytics Terms of Use and Privacy Policy support GDPR requirements.
- 7 Gen Analytics has appointed a director responsible for data protection. .
- The 7 Gen Analytics Platform has data deletion capability for its clients. 7 Gen Analytics is developing ease-of-use functionality to allow customers to effect data control and deletion on the 7 Gen Analytics Platform.
- 7 Gen Analytics currently processes requests for user-data deletion from our systems.
- Delete users' profiles: When requested by an organisation, 7 Gen Analytics will anonymise a user's personal data on the system on the request of an organisation and will allow the organisation to meet GDPR requirements. This will overwrite the personally identifying user information (name, phone, email, address, title and other customer fields if provided). Deleting users will not delete the user posts or uploaded files – which will remain available for the organisation, under a chosen name, as defined by the organisation.

- Delete account: While cancelling an account, admin can decide if they want to keep the organisation information (including personal data) for future use or delete it permanently.

7 Gen Analytics also monitors the guidance around GDPR compliance from privacy-related regulatory bodies and updates our product features and contractual commitments accordingly. We'll provide you with regular updates so that you're always fully aware of how we comply with the latest legislation.

Child Specific GDPR Policy

Recital 38 of the UK GDPR states that:

“Children require specific protection with regard to their personal data as they may be less aware of the risks, consequences and safeguards concerned and their rights in relation to the processing of personal data. Such specific protection should, in particular, apply to the use of personal data of children for the purposes of marketing or creating personality or user profiles and the collection of personal data with regard to children when using services offered directly to a child. The consent of the holder of parental responsibility should not be necessary in the context of preventive or counselling services offered directly to a child.”

7 Gen Analytics anonymizes all data collected from children and will not at any time hold any children's personal data unless required by law.

Child Personal Data - Responsibility

7 Gen Analytics's strategy is to facilitate and empower local community groups which will require, in most scenarios, the local community groups to gain consent on our behalf. The community groups act as an intermediary ensuring the child's personal data remains in the community.

Whilst child personal data strategies are agreed upfront with the partnering Community group it is the duty of 7 Gen Analytics to ensure that this has been carried out effectively as we believe the protection of children is all our responsibility.

Child Protection Strategy

As noted, child protection is the responsibility of every individual and organisation working with children. With our partners we will:

- design data processing so that it provides sufficient protection for children;
- put in place proportionate measures to prevent or deter children from providing their personal data;
- take appropriate actions to enforce any age restrictions to be set; or
- implement up-front age verification systems.

Marketing to Children

7 Gen Analytics will not be using any data to market to children directly. Our strategy is to work alongside schools and community groups to promote any events or activities.

Our Security Infrastructure

Protecting our customer's information and their users' privacy is extremely important to us. As a cloud-based company entrusted with our customer's data, we operate information security policies and guidelines to better safeguard electronic data and information. Our security model and controls are based on international protocols and cloud industry standards.

If you'd like to learn more about 7 Gen Analytics' security policies and procedures, please see our Security Protocols & Services. It provides detailed information on how we approach security and how 7 Gen Analytics ensures user data security.

Updates

We'll continue to monitor the guidance around GDPR compliance and will ensure that our product and processes are complying with that guidance when they become effective.

Does the GDPR prevent a company from storing data outside of the EU?

Nothing in the GDPR prevents businesses from storing data outside of the EU, provided that the data processors adhere to the necessary regulations and protections. At 7 Gen Analytics, we store our data with Amazon Web Service (AWS), which is based worldwide. However, we only store our data in AWS data centers located in Ireland and London. Like 7 Gen Analytics, AWS has announced that it is GDPR compliant.

Where can I learn more about GDPR?

Additional information is available on the official [GDPR website of the European Union](#).

I have more questions. Who should I contact?

If you have any additional questions about the GDPR you are welcome to contact us on admin@7genanalytics.com

FAQ's

Examples of personal data

If you are able to identify an individual either directly or indirectly (even in a professional capacity), then GDPR will apply

- a name and surname;
- a home address;
- an email address such as name.surname@company.com;
- an identification card number;
- location data (for example the location data function on a mobile phone)*;
- an Internet Protocol (IP) address;
- a cookie ID*;
- the advertising identifier of your phone;
- data held by a hospital or doctor, which could be a symbol that uniquely identifies a person.

Examples of data not personal

- a company registration number;
- an email address such as info@company.com;
- anonymised data.

Data Storage

Data will be stored securely. When it is stored electronically, it will be kept in password protected files. When it is stored online in a third party website (e.g. Google Drive) we will ensure the third party comply with the GDPR. When it is stored on paper it will be filed carefully in a locked filing cabinet.

Deletion of data

When we no longer need data, or when someone has asked for their data to be deleted, it will be deleted securely. We will ensure that data is permanently deleted from computers, and that paper data is shredded.

Collection of Data

We will keep records of consent given for us to collect, use and store data. These records will be stored securely.

Mailing lists

We will maintain a mailing list. This will include the names and contact details of people who wish to receive publicity and fundraising appeals.

When people sign up to the list we will explain how their details will be used, how they will be stored, and that they may ask to be removed from the list at any time. We will ask them to give separate consent to receive publicity and fundraising messages, and will only send them messages which they have expressly consented to receive.

We will not use the mailing list in any way that the individuals on it have not explicitly consented to.

We will provide information about how to be removed from the list with every mailing.

We will use mailing list providers who store data within the EU.

Supporting individuals

From time to time, individuals contact the Group to ask us to help them resolve an issue they are having with the council, relating to their housing or other local services.

We will request explicit, signed consent before sharing any personal details with the council or any other relevant third party.

We will not keep information relating to an individual's personal situation for any longer than is necessary for the purpose of providing them with the support they have requested.

Personal data relating to housing issues will be stored securely by a member of the committee, and not shared among the rest of the committee or with other volunteers unless necessary for the purpose of providing the support requested.

Details relating to the individual's circumstances and housing will be treated as strictly confidential.

Contacting volunteers

Local people volunteer in a number of ways. We will maintain a list of contact details of our recent volunteers. We will share volunteering opportunities and requests for help with the people on this list. People will be removed from the list if they have not volunteered for the group for 12 months.

When contacting people on this list, we will provide a privacy notice which explains why we have their information, what we are using it for, how long we will keep it, and that they can ask to have it deleted or amended at any time by contacting us.

To allow volunteers to work together to organise for the group, it is sometimes necessary to share volunteer contact details with other volunteers. We will only do this with explicit consent.

Contacting committee members

The committee needs to be in contact with one another in order to run the organisation effectively and ensure its legal obligations are met.

Committee contact details will be shared among the committee.

Committee members will not share each other's contact details with anyone outside of the committee, or use them for anything other than project related business, without prior consent.

Resources

- [ico.org.uk/-data-protection-regulation-gdpr/children-and-the-uk-gdpr/](https://ico.org.uk/data-protection-regulation-gdpr/children-and-the-uk-gdpr/)
- <https://cscp.org.uk/training/cscp-training-strategy-and-appropriate-training-levels>