



THE FREEMASONS' FUND FOR SURGICAL RESEARCH

GDPR Data Processing Policy approved by the Trustees at their meeting on the 8th of May 2024

THE PURPOSE OF THIS DOCUMENT

The Freemasons' Fund for Surgical Research ("FFSR") is committed to protecting the privacy and security of any personal information it holds.

This privacy notice describes how we collect and use personal information in accordance with the General Data Protection Regulation ("GDPR").

The FFSR is a "data controller" responsible for deciding how personal information is held and it reserves the right to amend or update this notice at any time.

DATA PROTECTION PRINCIPLES

The FFSR will comply with data protection law, i.e. information held must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that have been explained and not used in any way that is incompatible with those purposes.
3. Relevant to and limited to the work of the FFSR.
4. Accurate and kept up to date.
5. Kept only as long as necessary for our stated purposes.
6. Kept securely.

THE KIND OF INFORMATION HELD BY FFSR

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include anonymous data.

There are "special categories" of more sensitive personal data which require a higher level of protection, such as information about a person's health or sexual orientation.

The FFSR may collect, store, and use the following categories of personal information:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses
- Immigration status of the Trustees
- Copy of Trustee identity documents (e.g., driving licence, passport)
- CV's, application documents/letters and other relevant information for appointments to or funding by the FFSR
- Details of former Trustees and past applicants for funding from the FFSR
- Photographs

HOW PERSONAL INFORMATION IS COLLECTED

The FFSR collects personal information through the application procedures used for recruiting Trustees and for the consideration of awarding grants. Personal information may also be shared between Trustees in the course of their work for the FFSR, and kept by the FFSR if appropriate. Information is either provided by the Trustees, the United Grand Lodge of England, professional service providers retained by the FFSR or from the Royal College of Surgeons (in respect of applicants for funding from the FFSR).

HOW PERSONAL INFORMATION IS USED

Most commonly, personal information will be used in the following circumstances and only in accordance with the law:

1. When necessary, to advance the charitable purposes of the FFSR
2. Reporting to the United Grand Lodge of England
3. When needed to comply with a legal obligation including providing information to the Charity Commission
4. When it is necessary for the FFSR's legitimate interests (or those of a third party) and/or the interests of a Trustee and/or the Royal College of Surgeons and fundamental rights do not override those interests
5. To protect personal interests
6. When it is needed in the public interest
7. To record the work of the FFSR

Situations in which personal information may be used

Situations in which personal information may be processed are listed below:

- Making a decision about FFSR recruitment
- Keeping records of Trustee meetings
- Reporting to United Grand Lodge of England
- Considering and making a decision about applications for FFSR funding
- Checking legal entitlements
- Making any payments that may become due
- Sharing invitations to appropriate events
- Administering the FFSR
- Dealing with legal disputes
- Complying with health and safety obligations
- To prevent fraud
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution
- Equal opportunities monitoring

DATA SHARING

The FFSR may wish to share data with third parties, including third-party service providers when satisfied that such third parties respect the security personal data and treat it in accordance with the law.

The FFSR may transfer personal information outside the UK when satisfied that there is in place a similar degree of protection in respect of personal information.

When personal information will be shared with third parties

The FFSR will share personal information when required by law, if it is necessary to administer the charity you or where there is another legitimate interest in doing so.

All third-party service providers are required to protect personal information in line with this policy. Third-party service providers are not authorised to use personal data for their own purposes.

DATA RETENTION

The FFSR will only retain personal information for as long as necessary to fulfil the purposes for which it was collected. When determining the appropriate retention period for personal data, consideration is given to the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of personal data, the purposes for which the personal data was processed and whether the FFSR can achieve those purposes through other means, and the applicable legal requirements.

RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

Trustees must keep the FFSR informed if personal information changes during their appointment as a trustee.

Under certain circumstances, there is a legal right to:

- **Request access** to personal information (i.e. a “data subject access request”)
- **Request correction** of personal information held
- **Request erasure** of personal information
- **Object to the processing** of personal information where the FFSR
- **Request the restriction of processing** of personal information
- **Request the transfer** of your personal information to another party
- **Withdraw consent** from processing personal information

To review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Secretary of the FFSR in writing.

CHANGES TO THIS DATA PROCESSING POLICY

The FFSR reserves the right to update this data processing policy at any time.

DEFINITIONS

For the purposes of this policy, the following terms have the following meanings:

General Data Protection Regulation (“GDPR”); Regulation (EU) 2016/679

Royal College of Surgeons: The Charity registered with the Charity Commission under number 212808.

The Freemasons' Fund for Surgical Research (“FFSR”): The Charity registered with the Charity Commission under number 252951.

Trustee: a trustee of the FFSR and signatory to the trust deed and rules in force from time to time.

United Grand Lodge of England: of Freemasons' Hall, 60 Great Queen St, London WC2B 5AZ; the governing body of Freemasons in, *inter alia*, England and Wales.