

# Data Protection Policy

Founders For Good LTD

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## Definitions

The following terms are used throughout the remainder of the policy and are to be understood to mean the following:

<b>Charity</b>	means Founders For Good LTD, a registered charity in the UK.
<b>GDPR</b>	means the General Data Protection Regulation.
<b>Responsible Person</b>	means Neil Jansen.
<b>Register of Systems</b>	means a register of all systems or contexts in which personal data is processed by the Charity.

### 1. Data protection principles

The Charity is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction

or damage, using appropriate technical or organisational measures.”

## 2. General provisions

- a. This policy applies to all personal data processed by the Charity.
- b. The Responsible Person shall take responsibility for the Charity’s ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.

## 3. Lawful, fair and transparent processing

- a. To ensure its processing of data is lawful, fair and transparent, the Charity shall maintain a Register of Systems.
- b. The Register of Systems shall be reviewed at least annually.
- c. Individuals have the right to access their personal data and any such requests made to the charity shall be dealt with in a timely manner. To request personal data, please email [info@founderspledge.com](mailto:info@founderspledge.com).

## 4. Lawful purposes

- a. All data processed by the charity must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests ([see ICO guidance for more information](#)).
- b. The Charity shall note the appropriate lawful basis in the Register of Systems.
- c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- d. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the Charity’s systems.

## 5. Data minimisation

- a. The Charity shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- b. At present, the Charity utilizes the following information at the following service providers (so-called subprocessors) for the listed purposes:

Subprocessor	Data Collected	Purpose
Microsoft OneDrive	E-Mail Address, Name, Company, Company Number, Title, Mailing Address, Pledge Percentage, Phone Number, Digital Signature	Storage of signed pledge agreements as backup.
Amazon Web Services	E-Mail Address, Name, Company, Company Number, Mailing Address, Pledge Percentage, Phone Number, Avatar, IP Address	Needed for the Founders Pledge website.
Salesforce	E-Mail Address, Name, Company, Company Number, Company Valuation, Mailing Address, Pledge	Used as a CRM as well as for display on the Founders Pledge website.

	Percentage, Phone Number, E-Mails, Events Attended, Charities Deployed to, Deployment Amounts	
G Suite (Gmail, Docs, Calendar)	E-Mail Address, Name, Company, Company Number, Title, Mailing Address, Phone Number	E-Mail, storage of documents for our ongoing business, such as spreadsheets with information about Founders Pledge events, normal calendar use.
Google Drive	E-Mail Address, Name, Company, Company Number, Title, Mailing Address, Phone Number	Stores documents for our ongoing business, such as spreadsheets with information about Founders Pledge events.
Front	E-Mail Address, Name, Phone Number	E-Mail application used in conjunction with Gmail.
HelloSign	E-Mail Address, Name, Company, Company Number, Title, Mailing Address, Pledge Percentage, Phone Number, Digital Signature	Digital signing and storage of pledge agreements.
Benchmark Email	E-Mail Address, Name, City, Country	To email subscribers to our newsletter, sometimes based on location.
MailChimp	E-Mail Address, Name	Email non-pledge subscribers.
Eventbrite	E-Mail Address, Name	Event coordination.
Typeform	E-Mail Address, Name	Creating and administering surveys to get feedback and improve the service to our community.
Calendly	E-Mail Address, Name, Phone Number	Scheduling with potential pledgers.
Dropbox	Images	We collect photos from our events.
WhatsApp	Name, Phone Number	Phone communication with contacts.
Blendology	E-Mail Address, Name, Job Title, Company	Service provided at our Founders Pledge Forum to allow attendees to exchange contact information.
Youcanbook.me	E-Mail Address, Name, Company	Scheduling with the research team.

Note: Not all of the information listed here is collected in all cases. You can inquire as to which information has been collected about you at any time by emailing [info@founderspledge.com](mailto:info@founderspledge.com).

## 6. Accuracy

- a. The Charity shall take reasonable steps to ensure personal data is accurate.

- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

## **7. Archiving / removal**

- a. To ensure that personal data is kept for no longer than necessary, the Charity shall put in place an archiving policy for each area in which personal data is processed and review this process annually.
- b. The archiving policy shall consider what data should/must be retained, for how long, and why.
- c. Individuals have the right to have the totality of their data permanently deleted ('right to erasure', or 'right to be forgotten') in a timely manner. To make such a request, please email [info@founderspledge.com](mailto:info@founderspledge.com).

## **8. Security**

- a. The Charity shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c. When personal data is deleted this should be done safely such that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions shall be in place.

## **9. Breach**

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the Charity shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO ([more information on the ICO website](#)).

END OF POLICY