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## DATA PRIVACY NOTICE

### Swiss Benevolent Society (SBS)

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#### 1. Personal data

Personal data means any information relating to an individual person who can be identified from that data, such as name and contact details. Identification can be by that information alone or in association with any other information in the data controller's possession. The processing of personal data is governed by the General Data Protection Regulation ('the GDPR').

#### 2. Data controller

Swiss Benevolent Society is the data controller. This means it decides how your personal data is processed and for what purposes. SBS, through its board of trustees, complies with its obligations under the GDPR by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access, and disclosure; and by ensuring that appropriate technical measures are in place to protect personal data. The Swiss Benevolent Society takes these obligations seriously and does not use your personal data in any way you would not expect.

#### 3. Purposes for which the Swiss Benevolent Society processes your personal data.

##### SBS processes personal data for the following purposes:

- to comply with company and charity administration obligations.
- to maintain its financial accounts and records, including the processing of Gift Aid donations.
- to manage and administer employment records and comply with statutory obligations in relation with PAYE, NI, and Pension.
- to manage and administer general client support (such as moral advice)
- to administer and manage client financial application.
- to administer and manage incoming donations.
- to process its members list.

- to process its trustees list.
- to organise seminars.
- for social media marketing and mailing list inclusion, but only with your explicit consent.

#### **4. Lawful bases for processing your personal data.**

SBS relies on the following 'lawful bases' for processing personal data:

- Processing is necessary to comply with a legal obligation; or
- Processing is necessary for the performance of a contract or agreement between you and the Swiss Benevolent Society; or
- Processing is necessary based on the legitimate interests of SBS. Briefly, these are:
  - to achieve the SBS's objectives as a charity to enhance the quality of life of fellow Swiss in the UK, old and young, from all walks of life, who are experiencing difficulties.
  - to benefit individuals, such as clients and persons submitting enquiries.

#### **5. Collection of Data from Children**

SBS adheres to strict regulations regarding data collection from children/minors. We only collect data from a child/minor in the following situations, and only with the explicit consent of their legal guardian:

- When a child's information is necessary to assess a financial aid application (e.g., bursary) for their benefit.
- When a child's legal guardian submits a specific help request on their behalf.

#### **6. Sharing personal data**

Personal data is treated as strictly confidential and is only shared with others:

- to comply with a legal obligation (e.g., Companies House, Charity Commission, HM Revenue & Customs for Employment Obligations and Gift Aid donations, Pension Provider, and SBS Auditors); or
- based on a contract (e.g., with a successful applicant for financial help i.e. with a university for scholarships or an energy supplier when facilitating financial aid payments).
- with your explicit consent for specific purposes, such as social media marketing or mailing list inclusion.

#### **7. Data retention periods**

Data is kept by SBS only for as long as is necessary for the purpose it was collected or to comply with legal or regulatory obligations. The following data retention periods apply:

- SBS Welfare officer and trustees: as long as necessary for legal compliance.
- Donations: 8 years after the last donation.
- Applicants for funding – successful: 8 years after completion of project.
- Applicants for funding – unsuccessful: 5 years after application.
- Patrons: 3 years after ceasing to be a patron.
- Persons submitting enquiries: 5 years after the enquiry.
- General personal data: Maximum of 6 years after the last interaction with the client.
- Special category data: Shortest possible period to fulfil the original purpose, generally not exceeding 2 years (unless justified by exceptions under UK data protection law).
- Financial records: 8 years to comply with tax and accounting regulations.
- Legal records: As per legal advice and statutory requirements.

## 8. Your rights and your personal data

Unless subject to an exception under GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which the SBS holds about you (a 'subject access request').
- The right to request that the SBS corrects any personal data if it is inaccurate or out of date.
- The right, where there is a dispute about the accuracy or processing of your personal data, to request a restriction is placed on further processing.
- The right to request that your personal data is erased if it is no longer necessary for SBS to retain it.
- The right to withdraw your consent to the processing at any time.
- The right to request that the SBS provides you with your personal data and where possible, to transmit it directly to another data controller.
- The right to object to the processing of personal data.
- The right to file a complaint with the Information Commissioner's Office.

## 9. Data Security

We are committed to protecting your personal data from unauthorised access, disclosure, alteration, or destruction. We employ a range of technical and organisational measures to achieve this, including:

- Regularly backing up data and the use of encrypted data cloud storage
- Anti-virus programs and firewalls.
- Multi-factor authentication on our CRM and other software.

- Individual accounts with strong passwords for each staff member and trustee. Limiting data access to employees who have a legitimate business need.
- Keeping all software up-to-date.

## 10. Data Minimisation

We are committed to the principle of data minimisation. We only collect and retain the personal data necessary for the purposes outlined in this Notice. We conduct regular data screening by the data controller and promptly delete any data no longer required. We have procedures in place to securely delete personal data that is no longer required. These procedures comply with relevant legal requirements.

## 11. Further processing

If we wish to use your personal data for any purpose not covered by this Data Privacy Notice, then we will provide you with a new notice setting out the relevant purposes and processing conditions prior to doing so. Whenever necessary, we will seek your prior consent to the new processing.

## 12. Compliance & Responsibilities:

Failure to comply with this policy may result in disciplinary action and potential legal consequences.

- Data Protection Officer (DPO): Oversees policy implementation and compliance.
- Board of Trustees / Directors: Ensure teams adhere to retention and deletion procedures.
- Administrator / Employees: Implement technical measures for secure deletion.

## 13. Review and Updates

This policy will be reviewed annually or as needed to reflect changes in legal requirements or our organisational practices.

## 14. Contact details

In relation to all relevant rights and queries please contact the Company Secretary,

- Ms Nadine Hoffzimmer, at [info@swissbenevolent.org.uk](mailto:info@swissbenevolent.org.uk), Telephone: 0207 8369119  
Swiss Benevolent Society; 79 Endell Street; London WC2H 9DY

You can contact the Information Commissioner's Office on 0303 123 1113 or via email:

<https://ico.org.uk/global/contact-us/email/> or at: The Information Commissioner's Office - Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF