General Data Protection Regulation (GDPR) Policy

Effective Date: 28.01.2026
Review Cycle: Annually

1. Preamble

Saffron Kitchen Project (SKP) is committed to protecting the privacy, dignity, and personal data of all individuals we work with, including staff, volunteers, beneficiaries, partners, and trustees. This GDPR Policy outlines how SKP collects, stores, processes, and protects personal data in compliance with the EU General Data Protection Regulation (GDPR) and applicable national data protection laws.

SKP recognises that responsible data handling is an essential part of safeguarding, ethical practice, and trust-building with the communities we serve.

2. Scope

This policy applies to all personal data processed by SKP in the course of its activities, including data relating to:

- Staff and volunteers
- Trustees
- Beneficiaries and programme participants
- Partners, contractors, and external collaborators

All individuals acting on behalf of SKP are required to comply with this policy.

3. Definitions

General Data Protection Regulation (GDPR): The legal framework governing the collection, use, storage, and protection of personal data within the European Union.

Personal Data: Any information relating to an identifiable individual, such as name, contact details, identification data, or health information.

Special Category Data: Sensitive personal data including health information, safeguarding records, or information related to vulnerability.

4. Lawful Basis for Processing

SKP processes personal data only where there is a lawful basis to do so, including:

- Consent
- Contractual necessity
- Legal obligation
- Vital interests
- Legitimate interests, where these do not override individual rights

Consent may be withdrawn at any time.

5. Data Collection

SKP collects only the minimum personal data necessary to carry out its activities effectively and safely. This may include:

- Full name and contact details
- Emergency contact information
- Role-related documentation
- Health or accessibility information (where relevant and provided voluntarily)

Photography and media: Photos or videos are only taken and used with explicit, informed consent. Individuals may withdraw consent at any time.

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6. Data Retention and Deletion

SKP retains personal data only for as long as necessary:

- Volunteer data: Up to one year after the end of engagement, unless legally required otherwise
- Staff and contractor data: Up to six years after the end of employment or contract, in line with financial and legal obligations

Individuals may request deletion of their data at any time. Requests will be handled within 30 days, unless legal exemptions apply.

7. Data Security

All personal data is treated as confidential and stored securely using password-protected systems with restricted access. Security measures include:

- Access limited to authorised personnel only
- Secure cloud storage and device protection
- Regular review of access permissions

Any suspected data breach must be reported immediately.

8. Individual Rights

Under GDPR, individuals have the right to:

- Access their personal data
- Correct inaccurate data
- Request erasure of data
- Restrict or object to processing
- Request data portability

SKP will respond to all valid requests within 30 days.

9. Data Breaches

In the event of a personal data breach, SKP will:

- Assess the risk to affected individuals
- Notify the relevant Data Protection Authority within 72 hours where required
- Inform affected individuals where there is a high risk to their rights or freedoms

10. Responsibilities and Contact

Overall responsibility for GDPR compliance lies with:

- Director: Evelina Eskenazi – evelina@saffronkitchenproject.org



- Project Manager: Stella Elmatzoglou - stella@saffronkitchenproject.org

All data protection concerns, access requests, or erasure requests should be submitted in writing.

11. Review

This policy will be reviewed annually or following any significant legal or organisational change.