



## Policy: Data Protection

### DATA PROTECTION PRINCIPLES

The Charity is committed to processing data in accordance with its legal responsibilities.

Our ICO number is: **Z9052436**.

#### 1. DATA SHALL BE

- 1.1. Processed lawfully, fairly and in a transparent manner in relation to individuals.
- 1.2. Collected for specified, explicit and legitimate purposes and not further processed.
- 1.3. Adequate, relevant and limited to what is necessary.
- 1.4. Accurate and, where necessary, kept up to date.
- 1.5. Kept only as long as required.

#### 2. GENERAL PROVISIONS

- 2.1. This policy applies to all personal data processed by the Charity.
- 2.2. A Trustee shall take responsibility for the Charity's ongoing compliance.
- 2.3. This policy shall be reviewed **annually at SGM's**.
- 2.4. The Charity shall register with the Information Commissioner's Office.

#### 3. LAWFUL, FAIR AND TRANSPARENT PROCESSING

- 3.1. The Charity shall maintain a Register of Systems.
- 3.2. The Register of Systems shall be reviewed at least annually.
- 3.3. Individuals have the right to access their personal data.

#### 4. LAWFUL PURPOSES

- 4.1. All data processed must have consent.
- 4.2. The Charity shall note the appropriate consent in the Register of Systems.
- 4.3. Evidence of opt-in consent shall be kept.
- 4.4. The option to revoke their consent should be clearly available.

#### 5. DATA MINIMISATION

- 5.1. The Charity shall ensure that personal data is relevant and limited to what is necessary in relation to the purposes for which it is used.

#### 6. ACCURACY

- 6.1. Reasonable steps will be taken to ensure personal data is accurate.
- 6.2. Reasonable steps will be taken to ensure that personal data is **kept up to date**.

#### 7. ARCHIVING / REMOVAL

- 7.1. Ensure that personal data is kept for no longer than necessary.
- 7.2. Consider if it is necessary for data to be archived.
- 7.3. Where data is archived 6 years shall be the maximum time before deletion takes place.

#### 8. SECURITY

- 8.1. The Charity will ensure personal data is stored securely.
- 8.2. Access to personal data shall be limited to personnel who need access.
- 8.3. When personal data is deleted it should be irrecoverable.
- 8.4. Appropriate back-up and disaster recovery solutions shall be in place.

#### 9. BREACH

- 9.1. In the event of a data 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**.