

Data Protection Policy

The Christie Hall Wansford

Definitions:

Charity	The Christie Hall
GDPR	Means the General Date Protection Regulation
Responsible person	Means Lisa Chambers, person responsible for data protection within the Charity
Register of systems	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 is 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, 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 personal data, including protection against unauthorised security of 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. This 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 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.

4. Lawful purposes

a. The Charity shall note the appropriate lawful basis in the Register of Systems.

5. Data minimisation

a. The Charity shall ensure that personal data is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

6. Accuracy

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

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 policy annually.

b. The archiving policy shall consider what data should/must be retained, for how long and why.

8. Security

a. The Charity shall ensure that personal data is stored securely using modern software that is kept up to date. (The booking secretary will record your booking in the diary. This will be stored safely for a period of three years and then destroyed. The booking secretary shall use their computer to store information regarding a booking. Her computer will be will be covered with appropriate security software.)

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.

Policy Agreed: October 2019