

DATA PROTECTION POLICY

Our data protection policy sets out our commitment to protecting personal data and how we implement that commitment with regards to the collection and use of personal data.

1. We are committed to:

- Meeting our legal obligations as laid down by:
 - United Kingdom General Data Protection Regulations (UK GDPR)
 - EU General Data Protection Regulations (GDPR), 2018 (Regulation (EU) 2016/679)
 - Data Protection Act 2018
- Ensuring that data is collected and used fairly and lawfully in accordance with the above
- Processing personal data only in order to meet our operational needs or fulfil legal requirements and which forms part of our legitimate interests
- Taking steps to ensure that personal data is up to date and accurate
- Establishing appropriate retention periods for personal data
- Ensuring that data subjects' rights can be appropriately exercised
- Providing adequate security measures to protect personal data
- Ensuring that a nominated GDPR manager is responsible for data protection compliance and provides a point of contact for all data protection issues
- Ensuring that all staff are made aware of good practice of data protection
- Providing adequate training for all staff responsible for personal data
- Ensuring that everyone handling personal data knows where to find further guidance
- Ensuring that queries about data protection, internal and external to the organisation, is dealt with effectively and promptly
- Regularly reviewing data protection procedures and guidelines within the organisation
- Ensuring that we comply with the data protection principles, as listed below

2. Data protection principles

- Personal data shall be processed fairly and lawfully
- Personal data shall be obtained for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes
- Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed
- Personal data shall be accurate and, where necessary, kept up to date
- Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes
- Personal data shall be processed in accordance with the rights of data subjects under the General Data Protection Regulations for the UK and EU
- Appropriate technical and organisational measures shall be taken against unauthorised and unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data
- Personal data shall not be transferred to a country or territory outside the UK or European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data

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