

Data Protection Policy, Revoluton Arts CIC

1. Definitions

**Data Subject:** a living, identified or identifiable individual about whom we hold Personal Data. Data Subjects may be nationals or residents of any country and may have legal rights regarding their Personal Data.

**Personal Data:** any information identifying a Data Subject or information relating to a Data Subject that we can identify (directly or indirectly) from that data alone or in combination with other identifiers we possess or can reasonably access. Personal Data excludes anonymous data or data that has had the identity of an individual permanently removed. Personal Data can be factual (for example, a name, email address, location or date of birth) or an opinion about that person's actions or behaviour.

**Processing or Process:** any activity that involves the use of Personal Data. It includes obtaining, recording or holding the data, or carrying out any operation or set of operations on the data including organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transmitting or transferring Personal Data to third parties.

1. Introduction
   1. This Data Protection Policy sets out how we handle the Personal Data of our customers, suppliers, employees, workers and other third parties.
   2. This Data Protection Policy applies to all Personal Data we Process regardless of the media on which that data is stored or whether it relates to past or present employees, workers, customers, clients or supplier contacts, shareholders, website users or any other Data Subject.
2. Scope
   1. We recognise that the correct and lawful treatment of Personal Data will maintain confidence in the organisation and will provide for successful business operations.
   2. We aim to ensure that:
      1. Proper procedures are in place for the Processing and management of Personal Data
      2. There is someone within the organisation who has specific responsibilities for data protection compliance.
      3. A supportive environment and culture of best practice Processing of Personal Data is provided for staff.
      4. All staff understand that their responsibilities when Processing Personal Data and that methods of handling that information are clearly understood.
      5. Individuals wishing to submit a subject access request are fully aware of how to do this and who to contact.
      6. Staff understand that subject access requests need to be dealt with promptly and courteously.
      7. Individuals are assured that their Personal Data is Processed in accordance with the data protection principles, that their data is secure at all times and safe from unauthorised access, alteration, use or loss.
      8. Other organisations with whom Personal Data needs to be shared or transferred, meets compliance requirements.
      9. Any new systems being implemented are assessed on whether they will hold Personal Data, whether the system presents any risks, damage or impact to individuals’ data and that it meets this policy’s requirements.
3. Personal Data protection principles
   1. The Data Protection Act 2018 is the UK’s implementation of the General Data Protection Regulation (GDPR) Everyone is responsible for using Personal Data and must make sure information is:
      1. Used fairly, lawfully and transparently
      2. Used for specified, explicit purposes
      3. Used in a way that is adequate, relevant and limited to only what is necessary
      4. Accurate and where necessary kept up to date
      5. Not kept any longer than necessary
      6. Handled in way that ensures appropriate security, including protection against unlawful or unauthorised Processing, access, loss, destruction or damage
4. Responsibility
   1. This Data Protection Policy applies to you. You must read, understand and comply with this Data Protection Policy when Processing Personal Data on our behalf. This Data Protection Policy sets out what we expect from you for the Company to comply with applicable law. Your compliance with this Data Protection Policy is mandatory. Any breach of this Data Protection Policy may result in disciplinary action.
   2. The Directors carry and accept ultimate responsibility for compliance with the 2018 Act. It will be implemented through the organisation’s induction programme for staff.
   3. Directors are responsible for:
      1. Advising staff on data protection compliance
      2. Co-ordinate responses for subject access requests
      3. Ensuring adequate policies are in place for security of electronic information
   4. Staff are responsible for:
      1. Being familiar with and complying with the policy
      2. Observing and complying with the data protection principles
5. Processing Data
   1. In order to meet the requirements of the principles of the GDPR, we adhere to the following values when Processing Personal Data:
      1. Individuals will be made aware that their information has been collected, and the intended use of the data specified either on collection or at the earliest opportunity following collection.
      2. Personal Data will be collected and Processed only to the extent that it is needed to fulfil business needs or legal requirements.
      3. Personal Data held will be kept up to date and accurate.
      4. Retention of Personal Data will be appraised and risk assessed to determine and meet business needs and legal requirements, with the appropriate retention schedules applied to that data.
      5. Personal Data will be Processed in accordance with the rights of the individuals about whom the Personal Data are held.
      6. Individuals whose personal information is held on one of our databases will be provided with the option to ‘opt out’ of receiving future communications.
      7. Appropriate technical, organisational and administrative security measures to safeguard Personal Data will be in place.
      8. Data will not be shared with any third parties.
      9. All data subjects have a right of access to their own Personal Data.
6. Direct marketing
   1. We are subject to certain rules and privacy laws when marketing to our customers.
   2. The right to object to direct marketing must be explicitly offered to the Data Subject in an intelligible manner so that it is clearly distinguishable from other information.
   3. A Data Subject's objection to direct marketing must be promptly honoured. If a customer opts out at any time, their details should be suppressed as soon as possible. Suppression involves retaining just enough information to ensure that marketing preferences are respected in the future.
7. Measuring performance

Measuring performance is an essential element of the data protection management. Measuring performance provides an indication of the effectiveness of the Data Protection Policy and Directors commitment to continuous improvement. The Directors are responsible for ensuring the production of an annual audit reviewing procedures based on self-assessment, observations of working practices and consultation with staff. A short Data Protection statement will be included in the annual company report and any relevant objectives set for the following reporting period.

1. Reporting

If you know or suspect that a breach of this Data Protection Policy has occurred, do not attempt to investigate the matter yourself. Immediately contact your line manager. You should preserve all evidence relating to the potential breach.

Created on:

Signed off on: 22/07/2022

Last reviewed on: