

# Data Protection Policy

Friends of Strode Theatre

Last updated	24/05/2018
--------------	------------

## Definitions

<b>Charity</b>	means FRIENDS OF STRODE THEATRE, a registered charity.
<b>GDPR</b>	means the General Data Protection Regulation.
<b>Contractor</b>	means STRODE THEATRE (STRODE COLLEGE)

### 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 are 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, scientific or historical research purposes 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 the 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 on behalf of the Charity.
- b. The Charity engages The Contractor to process all of its data in accordance with GDPR and PECR.
- c. The Charity recognises and agrees for The Contractor to use a subcontractor (subprocessor) (Spektrix Ltd), as a system for data processing and storage. Read [Strode Theatre's Privacy Policy here](#)
- d. 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 Contractor shall maintain a Data Process Audit
- b. The Data Process Audit shall be reviewed at least annually by The Contractor and The Charity.
- c. Individuals have the right to access their personal data and any such requests will be referred to The Contractor to be dealt with as per The Contractor's Data Subject's Response Procedures.
- d. Data held by The Contractor is shared with Trustees of the Charity as per The Contractor's Privacy Policy.

### **4. Lawful purposes**

- a. All data processed on behalf of the charity must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests ([see ICO guidance for more information](#)).
- b. The appropriate lawful basis is noted in The Contractor's Data Process Audit.
- c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept by The Contractor with the personal data.
- d. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent are clearly available and can be viewed and edited on the Contractor's website [HERE](#).

### **5. Data minimisation and accuracy**

- a. The Charity shall ensure that personal data held by The Contractor are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- b. The Contractor is obligated to take reasonable steps to ensure personal data is accurate and kept up to date.

### **7. Archiving / removal**

- a. To ensure that personal data is kept for no longer than necessary, The Contractor shall put in place a data retention policy for each area in which personal data is processed and review this process annually.
- b. The Contractor's archiving policy shall consider what data should/must be retained, for how long, and why.

### **8. Security**

- a. The Charity shall ensure that the Contractor uses appropriate up-to-date software to keep data stored securely.
- b. The Charity shall ensure that access to personal data shall be limited to Contractor personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c. When the Contractor deletes personal data, this should be done safely such that the data is irrecoverable.
- d. The Contractor shall have 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 and if appropriate report this breach to the ICO ([more information on the ICO website](#)).

END OF POLICY