

# Data Protection Policy

Bilsdale Agricultural Show Society

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| Last updated | 23rd March 2019 | By: Jo Yates. |
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## Definitions

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| <b>Charity</b>             | means Bilsdale Agricultural Show Society, a registered charity. Charity number 1156940          |
| <b>GDPR</b>                | means the General Data Protection Regulation.   |
| <b>Responsible Person</b>  | means [insert name of person responsible for data protection within the Charity].               |
| <b>Register of Systems</b> | 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, for marketing and communication and to ensure compliance with legal and regulatory requirements shall not be considered to be incompatible with the initial purposes;
- c. adequate, relevant and limited to what is necessary to run the annual Bilsdale Show
- d. accurate and, where necessary, kept up to date; every reasonable step will be taken to ensure that inaccurate personal data, 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, future show marketing, communication and to

ensure compliance with legal and regulatory requirements 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 by the Charity.
- b. The Responsible Person shall take responsibility for the Charity’s ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.
- d. The Charity shall register with the Information Commissioner’s Office as an organisation that processes personal data if applicable

## **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** i.e. who holds information and how they process, store and update it.
- b. The Register of Systems shall be reviewed at least 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. All data processed by the charity must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests
- b. The Charity shall note the appropriate lawful basis in the Register of Systems.
- c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- d. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the Charity’s systems.

## **5. Data minimisation**

- a. The Charity shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- b. Personal data will be processed and stored for the sole purpose of running an annual Bilsdale agricultural show

## **6. Accuracy**

- a. The Charity shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.
- c. Individual committee members collecting, using and storing information will be responsible ensuring it is accurate and up to date.

## **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 process 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 in files or using modern software that is kept-up-to-date.
- 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 and if appropriate report this breach to the ICO.

END OF POLICY