

Shared Future CIC

Data Protection Policy Statement

Aims of this policy

Shared Future Community Interest Company (SFCIC) needs to keep certain information on its Directors, Associates, Clients and Beneficiaries, to carry out its day to day operations, to meet its objectives and to comply with legal obligations.

Shared Future CIC are 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.

General provisions

- a. This policy applies to all personal data processed by Shared Future CIC
- b. The Responsible Person shall take responsibility for Shared Future CIC's ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.
- d. Shared Future CIC shall register with the Information Commissioner's Office as an organisation that processes personal data.
- e. Everyone managing and handling personally identifiable information is trained to do so.

- f. Anyone wanting to make enquiries about handling personal identifiable information, whether a member of staff, volunteer or otherwise, knows what to do;
- g. Any disclosure of personal data will be in line with our procedures.
- h. Queries about handling personal information will be dealt with swiftly and politely.

Lawful, fair and transparent processing

- a. To ensure its processing of data is lawful, fair and transparent, Shared Future CIC shall maintain a Register of Systems.
- 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 Shared Future CIC shall be dealt with in a timely manner.

Lawful purposes

- a. All data processed by Shared Future CIC 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. Shared Future CIC 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.

Data minimisation

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

Accuracy

- a. Shared Future CIC 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.

Archiving / removal

- a. To ensure that personal data is kept for no longer than necessary, Shared Future CIC 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.

Security

- a. Shared Future CIC shall ensure that personal data is stored securely 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.

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).

We will ensure that:

- a. Training and awareness raising about the Data Protection Act and how it is followed in this organisation will take the following forms:
- b. On induction: all new Directors, associates, employed staff and volunteers will be informed of SFCIC’s data protection policies and of their individual responsibilities when processing, handling and storing data.
- c. As an organization: it is SFCIC’s policy to review and revise this policy as necessary at regular intervals and inform Directors, associates, employed staff and volunteers of any changes.

Subject access requests

Anyone whose personally identifiable information we process has the right to know:

- What information we hold and process on them
- How to gain access to this information
- How to keep it up to date
- What we are doing to comply with the Act.

In some circumstances they have the right to prevent processing of their personally identifiable information and the right to correct, rectify, block or erase personally identifiable information regarded as wrong.

Any person wishing to exercise this right should apply in writing to Shared Future CIC at our registered office.

Review

This policy will be reviewed at intervals of two years to ensure it remains up to date and compliant with the law.

<i>(Director)</i>	Matthew MacDonald
<i>(Administrator)</i>	Jayne McFadyen
<i>(Named Project Lead)</i>	has responsibility for ensuring this policy is put into practice on location during projects and events.

Signed:.....Matthew MacDonald.....(Director)

Date:..27 / 06 /2018..... Review Date: 28/06/2019.....