

---

# Data Protection Policy - GDPR

---

## Introduction

The Company aims to promote high standards to protect individuals' rights to privacy. This encompasses the handling and processing of personal information, audio or video recordings and still photographs made in the course of workshops and shows. It applies to all forms of data, be they electronic, paper or digital media, and includes students, employees, volunteers, suppliers and members of the public.

Failure to comply with this policy may result in (internal) disciplinary proceedings.

## Responsibilities

It is every staff members' responsibility to ensure that:

All personal data is kept securely in the course of their work to ensure confidentiality is maintained. Personal information must not be disclosed in writing, orally or accidentally to any unauthorised persons.

Information provided to the Company is current and accurate.

The Company is informed of any changes to personal information held in the record(s).

The Company is informed of any errors or changes in staff information.

## Data Access and Usage

Staff should exercise reasonable care to safeguard all documentary or other materials containing confidential information. Intellectual property under copyright law: Access to Films, videos, and activity photographs held by the Company shall only be allowed where prior permission has been granted by the individual concerned.

Access to all other data shall be limited to persons that have been expressly permitted to view/use the data by the Freewheelers Data Controller.

## Subject's Rights to Access Information

Any individual shall have the right to access any personal data kept about them on electronic or paper files. Any person wishing to receive notification of the information being held must do so in writing.

## Designated Data Controller

The Operations Manager shall be the designated data controller on a day-to-day basis for the Company as an organisation.

## Data Collected

The Company will hold personal records that cover:

Employment: Recruitment and selection process. Employment/contract records. Monitoring and evaluation at work. Workers' rights.

Details, including health information and third party contacts for the students, staff and volunteers. This must be relevant to the individual's safety whilst engaged with the Company.

DBS checks and other referrals.

Supplier details: business address and location, contracts...

Funders and donor contacts.

Details of contacts who have expressed an interest in the activities of the Company.

All Company soft and hard copy correspondence.

## **Data Retention**

All data shall be:

Kept within the UK, and be confidential and secure at all times (before, during and after engagement with the Company).

Retained fairly and lawfully, within the guidelines of The Data Protection Act 1998, and, from May 2018, The EU General Data Protection Regulation (GDPR).

Adequate, relevant and not excessive.

Accurate, and updated as necessary.

Processed with regard to the rights of the individual.

All data held in an electronic form (database) shall be stored on UK based, encrypted servers, access to which shall be strictly controlled by user name and password. The logon shall also dictate the level of data accessible to that individual.

All electronic data shall be securely backed up.

Kept as long as necessary, or as specific statutes stipulate.

Any personal information held on the company's mailing database will be removed at the request (in writing) of the individual.

Where transfer outside the UK is deemed necessary this shall only be permitted where the receiving country has sufficient data protection law. It shall be adequately protected in transit.

---

END OF POLICY

Next review Jul 2022

---