

## Data Protection Policy Deal Icebreaker 1981 for Documentation

Note about this policy template: Lots of template policies are unhelpfully long and simply reiterate large portions of the legislation. This template is different: it aims to provide a concise and practical document that can be used by trustees of small charities as the foundation for a working Data Protection Policy. If you have any doubt about your legal obligations you should always check with a lawyer.

Last updated 14/09/2018

Definitions Deal Icebreakers means Deal Icebreaker 1981 GDPR means the General Data Protection Regulation. Responsible Person means Margaret Edwards, Deal Icebreakers Secretary Register of Systems means a register of all systems or contexts in which personal data is processed by the Deal Icebreakers.

1. Data protection principles The Deal Icebreakers is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

- processed lawfully, fairly and in a transparent manner in relation to individuals;
- 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;
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- 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;
- 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
- 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

- This policy applies to all personal data processed by the Deal Icebreakers.

- The Responsible Person shall take responsibility for the Deal Icebreakers ongoing compliance with this policy.
- This policy shall be reviewed at least annually.

### 3. Lawful, fair and transparent processing

- To ensure its processing of data is lawful, fair and transparent, the Deal Icebreakers shall discuss what we do with data at least annually.
- Individuals have the right to access their personal data and any such requests made to the Deal Icebreakers shall be dealt with in a timely manner.

### 4. Lawful purposes

- All data processed by the Deal Icebreakers 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).
- Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- 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 Deal Icebreakers systems.

### 5. Data minimisation

- The Deal Icebreakers shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

### 6. Accuracy

- The Deal Icebreakers shall take reasonable steps to ensure personal data is accurate.
- 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.

### 7. Archiving / removal

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

### 8. Security

- The Deal Icebreakers shall ensure that personal data is stored securely using modern software that is kept-up-to-date.

- 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.
- When personal data is deleted this should be done safely such that the data is irrecoverable.
- 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 Deal Icebreakers 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).

## **Deal Icebreaker 1981 for Website**

### **Website Privacy Statement**

This privacy statement discloses the privacy practices for Deal Icebreakers. It applies solely to this website. We analyse digital records which contain details such as:

- IP addresses
- Web pages viewed while on the Deal Icebreakers website
- Web browser used
- Type of digital device accessing the website

Where users provide us with information, that information is treated in accordance with the Data Protection Act 1998.

### **Forms**

Any information submitted through forms on this website is transferred to us by email and will be dealt with by us in accordance with data protection legislation. Emails are not encrypted before being sent to us and as the internet is not always totally secure, users are sending the information at their own risk.

### **Notification of changes**

Information about any changes to our privacy policy will be posted on this website.

### **Disclaimer**

Deal Icebreakers takes every effort to ensure that the information published on this website is accurate. However, we cannot accept any liability for the accuracy or content. Under no circumstances shall the Deal Icebreakers be liable for any loss or damage arising from the use of or reliance on information contained within the site.

By using this website you show that you understand and acknowledge that no contractual or other legal relationship is created between you and Deal Icebreakers, its members, trustees, agents and/or employees through your use of the site.

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Where images of people appear on this site, those people have given their consent for the use of the images for this site. The use of these images for any other purpose would constitute a breach of confidentiality on the part of the person using them for that other purpose.

### **Data Retention Policy**

This website operates with a data-retention policy in order to comply with the Privacy Enhancing Technology guidance from the Information Commissioner. This means that data has predefined time limits for storage and is only retained by the system for as long as it is considered useful.

### **Analytics**

Like most websites, we make use of analytics software in order to help us understand the trends in popularity of our website. We make no use of personally identifiable information in any of the statistical reports we use from this package.

We use an analytics package called Google Analytics who provides separate details in the Google privacy policy.

To opt out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>.

### **Server Statistics**

Again, like most websites we have access to server statistics which provide aggregated statistics on bandwidth and server load. This load data is used to manage bandwidth effectively.

The server statistics are not designed to collect any individually identifiable information and the reports we receive are generally numerical and in graph format.

Alongside the server statistics, we collect information on: popular search terms used on the website, which we have access to in order to arrange our pages better; visitor path information, which we will use for future design considerations; and file download popularity (numerical by month), which we use to determine popular and out-dated documents.

### **Virus Protection**

It is recommended that you run an anti-virus and a firewall program. We cannot accept any responsibility for any loss, disruption or damage to your data or your computer system which occurs while using material derived from this website.

**Availability**

We cannot guarantee uninterrupted access to this website or the sites to which it links. We accept no responsibility for any damages arising from the loss of use of this information.

**END OF POLICY**