

Data Protection Policy

Leeds Tidal

Last updated	May 2018
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Definitions

GDPR	General Data Protection Regulation.
Responsible Person	The Tidal Coordinator. Her contact details are maia.kelly@leedstidal.org

1. Data protection principles

Leeds Tidal 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 by Leeds Tidal.

- b. The Responsible Person shall take responsibility for Leeds Tidal's ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.
- d. Leeds Tidal is not obligated to register with the Information Commissioner's Office as an organisation that processes personal data because we are a non-profit.

3. Lawful, fair and transparent processing

- a. To ensure its processing of data is lawful, fair and transparent, Leeds Tidal shall maintain a Register of Systems.
- b. The archive shall be reviewed at least annually.
- c. Individuals have the right to access their personal data and any such requests made to Leeds Tidal shall be dealt with in a timely manner.

4. Lawful purposes

- a. All data processed by Leeds Tidal 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. Leeds Tidal 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 Leeds Tidal's systems.
- e. Leeds Tidal shall always get explicit consent from individuals featured clearly in photos for us to archive and use them (eg on website, newsletters and social media). This means recognisable photos, not images of crowds outdoors.

5. Data minimisation

- a. Leeds Tidal 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. We won't keep names and email addresses beyond the time period of each event or training.
- c. We won't keep names, email addresses and postal addresses if a supporter stops their financial support.
- d. We won't keep contact details of data subjects who unsubscribe from one of our e-mailing lists.
- e. Invoices are kept securely in paper and electronic formats for accounting purposes.
- f. Name and contact details on previous employees, volunteers, directors, partners or contractors are only kept in order to provide references if requested.
- g. Pay records will only be kept for 3 years as HMRC may request them in that time.
- h. Contracts, appraisals, personal records will only be kept for 6 years as claims for breach of contract can be brought in the civil courts at any time within six years of the alleged breach.

- i. CVs and interview notes of unsuccessful applicants for a post will only be kept for 6 months as a claim could be made in that time. With explicit consent this data can be kept for longer should future employment opportunities arise.
- j. When a director steps down from the board their sensitive data (regarding political affiliations, trade union membership, and other directorships needed for grant applications) will be deleted.

6. Accuracy

- a. Leeds Tidal 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. To keep things up to date, we will occasionally email supporters the information we have of them and ask for verification that its still correct.

7. Archiving / removal

- a. To ensure that personal data is kept for no longer than necessary, Leeds Tidal shall put in place an archive for each area in which personal data is processed and review this archive annually.
- b. The archive policy shall consider what data should/must be retained, for how long, and why.
- c. We keep archives for photographic data consent, previous employees, directors, volunteers, partners, contractors and current supporters.

8. Security

- a. Leeds Tidal 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.

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, Leeds Tidal 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](#)).

Acknowledgments

This Policy is based on a template provided by White Fuse, [Privacy and Policy Notice template for Charities](#)