



Dance Hastings CIO

Data Protection Policy

April 2020

Data protection principles

Dance Hastings CIO 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
- 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 relating to dancers, personal assistants, facilitators, volunteers, self-employed staff, and visitors to the classes
- b. Information collected may include full name, age range, telephone numbers, email addresses, medical conditions, emergency contact details
- c. Data is processed by the Charity for the purposes of maintaining a register of sessions, a list of suitably qualified and experienced dance facilitators, and volunteer dance buddies
- d. The Trustees will take responsibility for the Charity's ongoing compliance with this policy.
- e. This policy shall be reviewed at least annually.
- f. The Charity shall register with the Information Commissioner's Office as an organisation that processes personal data.

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
- 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

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 ([see ICO guidance for more information](#))
- 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

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. The Charity shall ensure that personal data is retained no longer than is reasonably required for archiving purposes

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. The Charity shall take reasonable steps to enable requests for data to be updated or removed from the register of systems

Archiving / removal

- a. To ensure that personal data is kept for no longer than necessary, the Charity review personal data held, on an annual basis

Security

- a. The Charity shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- b. Computer systems holding personal data shall be password protected.
- c. Paper records shall be kept in a locked filing cabinet.
- d. The use of USB memory sticks shall be minimised and all devices shall be encrypted.
- e. 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.
- f. When personal data is deleted this should be done safely such that the data is irrecoverable.
- g. 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](#)).