

# Data Protection Policy

***Our data protection policy sets out our commitment to protect personal data and the way we implement the commitment concerning the collection and use of personal data.***

## We are committed to

- Ensure that we comply with the *nine data protection principles*, as listed under “**How we work**”.
- Meet our legal obligations as laid down by General Data Protection Regulation (GDPR) in EU.
- Ensure that data is collected and used fairly and lawfully.
- Process personal data only in order to meet our operational needs or fulfil legal requirements.
- Take steps to ensure that personal data is up to date and accurate.
- Establish appropriate retention periods for personal data.
- Ensure that data subjects' rights can be appropriately exercised.
- Provide adequate security measures to protect personal data.
- Ensure that a nominated officer is responsible for data protection compliance and provides a point of contact for all data protection issues.
- Ensure that all staff are made aware of good practice in data protection.
- Provide adequate training for all staff responsible for personal data.
- Ensure that everyone handling personal data knows where to find further guidance.
- Ensure that queries about data protection, internal and external to the organisation, is dealt with effectively and promptly.
- Regularly review data protection procedures and guidelines within the organisation.

## How we work

1. Personal data shall be processed fairly and lawfully.
2. Personal data shall be obtained for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes.
3. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
4. Personal data shall be accurate and, where necessary, kept up to date.
5. Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
6. Personal data shall be processed in accordance with the rights of data subjects under the General Data Protection Regulation (GDPR).
7. Appropriate technical and organisational measures shall be taken against unauthorised and unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
8. Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.
9. Risk assessments are updated regularly, and when essential changes in threats and vulnerabilities are suspected.



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