

## **Data Protection Policy**

Our data protection policy sets out our commitment to protecting personal data and how we implement that commitment with regards to the collection and use of personal data.

We are committed to:

- Ensuring that we comply with the eight data protection principles, as listed on the following page.
- Meeting our legal obligations under the Data Protection Act 1998, and the subsequent General Data Protection Regulations 2016.
- Ensuring that data is collected and used fairly and lawfully
- Processing personal data only in order to meet our operational needs or fulfil legal requirements
- Taking steps to ensure that personal data is up to date and accurate
- Establishing appropriate retention periods for personal data
- Ensuring that data subjects' rights can be appropriately exercised
- Providing adequate security measures to protect personal data
- Ensuring that a nominated officer is responsible for data protection compliance and provides a point of contact for all data protection issues
- Ensuring that all staff are made aware of good practice in data protection
- Providing adequate training for all staff responsible for personal data
- Ensuring that everyone handling personal data knows where to find further guidance
- Ensuring that queries about data protection, internal and external to the organisation, is dealt with effectively and promptly
- Regularly reviewing data protection procedures and guidelines within the organisation.

# The 8 data protection principles

The Data Protection Act sets out eight principles governing the use of personal information which we must comply with, unless an exemption applies. The principles are in essence a code of good practice for processing personal data. Expanded information on each of the principles is available in Schedule 1 part 2 of the Act.

**First principle** - Personal data shall be processed fairly and lawfully and, in particular, shall not be processed unless at least one of the conditions in Schedule 2 is met and in the case of sensitive personal data, at least one of the conditions set out in Schedule 3 or either of the two Statutory Instruments below is met.

**Second principle** - Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes.

**Third principle** - Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.

**Fourth principle** - Personal data shall be accurate and, where necessary, kept up to date.

**Fifth principle** - Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

**Sixth principle** - Personal data shall be processed in accordance with the rights of data subjects under this Act.

**Seventh principle** - Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.

**Eighth principle** - 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.

## Links:

[Schedule 1 part 2 of the Data Protection Act](#)

[Schedule 2](#)

[Schedule 3](#)

[Statutory Instrument 417/2000](#)

[Statutory Instrument 2905/2002](#)