

The Promise

Data Protection Policy

Last updated	March 2020
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Definitions

GDPR	means the General Data Protection Regulation.
Responsible Person	means The Director

1. Data protection principles

The Promise 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 ThePromise relating to staff, trustees, volunteers, partners, supporters, service users and donors.
- b. The Director shall take responsibility for ThePromise's ongoing compliance with this policy.
- c. This policy shall be reviewed by the Director and board of trustees at least annually.

3. Lawful, fair and transparent processing

- a. To ensure its processing of data is lawful, fair and transparent, ThePromise shall maintain secure records by way of password protected IT equipment and locked filing cabinets in which personal data is held.
- b. The content of these records shall be reviewed at least annually to ensure they are accurate and up to date.
- c. Individuals have the right to access their personal data and any such requests made to ThePromise shall be dealt with in a timely manner by the Director and at no cost to the individual.

4. Lawful purposes

- a. All data processed by ThePromise shall be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests.
- b. ThePromise shall keep a record of evidence relating to which appropriate lawful basis data has been processed when recording personal data.
- c. Where consent is relied upon as a lawful basis for processing data ThePromise will ensure a double opt-in consent process has been followed.
- d. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent shall be clearly available.
- e. Online and offline systems will be in place to ensure such revocation is reflected accurately in ThePromise 's records.

5. Data minimisation

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

6. Accuracy

- a. ThePromise shall take reasonable steps to ensure personal data is accurate by reviewing any unclear data with the individual.
- b. Where necessary steps shall be put in place to ensure that personal data is kept up to date.

7. Archiving & Removal

- a. ThePromise shall hold personal information for as long as is necessary for the relevant activity, or as long as is set out in any relevant contract, or in accordance with the Data Retention Policy, or for a maximum period of 7 years.
- b. Information that is no longer required, has been requested to be removed or has been held for 7 years will be anonymised or removed from all online and offline systems and safely destroyed.

8. Security

- a. ThePromise shall ensure that personal data is stored securely using modern security software that is kept-up-to-date and is password protected.
- b. All security software will be reviewed and updated at least annually following advice from a relevant IT professional.
- c. Access to personal data shall be limited to personnel who need access and appropriate security will be in place to avoid unauthorised sharing of information, including the use of password protected documents and sharing via secure online systems.
- d. When personal data is deleted it will be done safely such that the data is irrecoverable.
- e. Appropriate back-up procedures will be in place with all electronic records saved on an external hard drive that will be kept in a locked filing cabinet.
- f. Appropriate disaster recovery solutions shall be in place as advised by a relevant IT professional.

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, ThePromise shall adhere to the procedures laid out in the Data Breach Management Policy.