Volunteer It Yourself Data Protection Policy

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Policy statement

This Data Protection Policy applies to personal information that we, Volunteer It Yourself (VIY), collect about individuals who interact with our organisation. It explains how we handle personal data and make sure that it is protected.

Data protection principles

We are committed to processing data in accordance with our responsibilities under the GDPR. Article 5 of the GDPR requires that personal data shall be:

- Processed lawfully, fairly and in a transparent manner in relation to individuals
- 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 incompatible with the initial purposes
- Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed
- 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
- 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
- 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

- This policy applies to all personal data that we process
- The Responsible Person shall take responsibility for VIY's ongoing compliance with this policy
- This policy shall be reviewed at least annually
- VIY is registered with the Information Commissioner's Office as an organisation that processes personal data

Lawful, fair and transparent processing

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

Lawful purposes

- All data that we process must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests
- We shall note the appropriate lawful basis in the Register of Systems
- Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data
- 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 our systems

Data minimisation

- We shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed
- Where data is collected on the basis of consent, we will seek renewal of consent at least every three years
    - Where it is not possible to renew consent for the storage of personal data:
        - Data will be pseudonymised if it is required for evaluation purposes
        - Data will be anonymised if it is not required for evaluation purposes
- For the purpose of the City & Guilds accreditation we are required to store the data for five years and we will delete that data promptly once it is no longer required

Accuracy

- We shall take reasonable steps to ensure personal data is accurate
- 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

Data subject rights

- Individuals who interact with VIY have the following rights regarding their personal data:
    - The right to be informed about what data we process, how we process it, why we process it and other key information
    - The right to access their personal data
    - The right to edit and update their personal data
    - The right to request that their personal data be deleted
    - The right to restrict processing of their personal data
    - The right to object to the processing of their personal data, including automated decision making and profiling
- If individuals wish to exercise these rights, their request should be sent by email to info@teamviy.com. The request should include their full name.

Archiving / removal

- To ensure that personal data is kept for no longer than necessary, we shall put in place archiving procedures for each area in which personal data is processed and review this process annually
- The archiving procedures shall consider what data should/must be retained, for how long, and why

Security

- We shall ensure that personal data is stored securely using modern software that is kept up-to-date
- 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
- When personal data is deleted this should be done safely such that the data is irrecoverable
- 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, we shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO.

Contact
If an individual has any questions about how their information is being used, they should contact VIY's Data Protection Officer at info@teamviy.com.