



CDRC Data Protection Policy

Policy prepared by: Barbara Lane

Approved by CDRC Trustees on: 01/10/2018

Policy became operational on: 01/10/2018

Next review date: 01/10/2019

Introduction

CDRC needs to gather and use certain information from individuals or organisations who borrow costumes from us.

This policy describes how this personal data must be collected, handled and stored to meet CDRC's data protection standards - and to comply with the law.

Why this policy exists

This data protection policy ensures CDRC:

- Complies with data protection law and follows good practice
- Protects the rights of staff and clients
- Is open about how it stores and processes individuals' data
- Protects itself from the risks of a data breach

Data protection law

The Data Protection Act 1998 describes how organisations - including CDRC - must collect, handle and store personal information.

These rules apply regardless of whether data is stored electronically, on paper or on other materials.

To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully.

The Data Protection Act is underpinned by eight important principles. These say that personal data must:

1. Be processed fairly and lawfully
2. Be obtained only for specific, lawful purposes

3. Be adequate, relevant and not excessive
4. Be accurate and kept up to date
5. Not be held for any longer than necessary
6. Processed in accordance with the rights of data subjects
7. Be protected in appropriate ways
8. Not be transferred outside the European Economic Area (EEA), unless that country or territory also ensures an adequate level of protection

People, risks and responsibilities

Policy scope

This policy applies to:

- All staff and volunteers of CDRC
- All clients who borrow items from CDRC

Data protection risks

This policy helps to protect CDRC from some very real data security risks, including:

- Breaches of confidentiality. For instance, information being given out inappropriately.
- Failing to offer choice. For instance, all individuals should be free to choose how the CDRC uses data relating to them.
- Reputational damage. For instance, CDRC could suffer if hackers successfully gained access to sensitive data.

Responsibilities

Everyone who works for or with CDRC has some responsibility for ensuring data is collected, stored and handled appropriately.

Each team that handles personal data must ensure that it is handled and processed in line with this policy and data protection principles.

However, these people have key areas of responsibility:

The CDRC Trustees are ultimately responsible for ensuring CDRC meets its legal obligations. The charity does have a **Data Protection Officer, Barbara Lane** and can be contacted by emailing resources@cdrc.co.uk if you have any queries.

When do we collect your data?

Your data is collected at the time you book an order or come to collect your costumes.

What data do we collect?

Your name, postal address, email address, telephone number and the organisation you represent. Your donation and whether it can be gift aided will also be noted.

Why do we collect your data and how do we use it?

We collect it so that we have some way of contacting you if we have not had our costumes returned to us as previously agreed and to remind you of your donation. If you have agreed to Gift Aid your donation your data will be used to collect Gift Aid from HMRC. We will also keep you updated with our termly newsletter, forthcoming events and any changes to the service that may affect you.

How long do we keep it?

Your details will be kept on file until such time as you have returned your items and made a donation. If you have opted in to receive updates from us, your details will remain on our system.

How do we protect your data?

Data kept digitally on our system will be protected by password access and data kept physically on paperwork will be protected by lock and key.

Your rights

You have the right to ask for a copy of the data that we hold on you.

You have the right to ask us to delete your personal data from our records.

You have the right to opt out of receiving our charity updates.

You have the right to update your details with us.

We will never disclose your details to a third party.

Disclosing data for other reasons

In certain circumstances, the Data Protection Act allows personal data to be disclosed to law enforcement agencies without the consent of the data subject.

Under these circumstances, CDRC will disclose requested data. However, the Data Protection Officer will ensure the request is legitimate, seeking assistance from the trustees and from CDRC's legal advisers where necessary.