



Withy Arts Data Protection Policy, compliant with General Data Protection Regulations (GDPR) (2018)

Withy Arts is committed to processing data in accordance with its responsibilities under the GDPR, which state that personal data shall be treated in the following ways

- Processed lawfully, fairly and in a transparent manner in relation to individuals
- Collected for specified, explicit and legitimate purposes
- Adequate, relevant and limited to what is necessary in relation to the purposes for which it they are processed
- Accurate and kept up to date where necessary
- Kept for no longer than necessary
- Processed securely.

General Provisions

1. This policy applies to all personal data processed by Withy Arts.
2. One of the trustees, Phillip Holmes, takes responsibility for Withy Arts' compliance with this policy.
3. The policy will be reviewed annually.

Lawful, Fair and Transparent Processing

1. Withy Arts records how it uses data and for which lawful purposes.
2. Individuals whose personal data is collected by Withy Arts have the right to access their personal data and correct or delete it if necessary. Requests to do so will be handled in a timely manner.

Lawful Purposes

1. All data processed by Withy Arts must be done on one of the following bases; consent, contract, legal obligation, vital interests, public task or legitimate interest.
2. Evidence is available that 'opt-in' consent has been sought and obtained.
3. When Withy Arts communicates with individuals, the option to revoke their consent is in place.

Data Minimisation

1. Withy Arts ensures that personal data is adequate, relevant and limited to what is necessary for the purpose for which it is processed.

Accuracy

1. Withy Arts takes reasonable steps to ensure personal data is accurate and kept up to date where necessary.

Archiving/Removal

1. Personal data is kept no longer than necessary, i.e. for the life of the project that an individual has been involved with.
2. Individuals will be invited at the end of a project to stay in touch with Withy Arts by 'following' the blog i.e. submitting their email address to the website so that they receive notification when a blog post is made.



3. Photographs of project participants will be archived using Withy Arts' secure cloud storage. Archived photographs will be used for strictly limited purposes, namely the learning of project workers and trustees. They will not be republished without explicit extra consent being sought and provided by individuals.

Security

1. Withy Arts ensures that personal data is stored securely using software that is updated regularly and that devices on which personal data is processed are password-protected.
2. Access to personal data is limited to people who need it for the purposes for which it was collected and no others.
3. When personal data is deleted it should be done safely and in a way that is irrecoverable.
4. Appropriate back-up systems should be in place.

Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss or unauthorised disclosure of personal data, Withy Arts will promptly assess the risk to people's rights and freedoms and take appropriate action.

Ratified by Withy Arts Trustees:
Review date January 2020