



GDPR Data Protection Policy

Version and Terminology

Version:	EPS_GDPR_1
Last Updated:	09 April 2019
Authorised:	
Date of Revision:	09 April 2020 or legislative updates

Charity	means Environmental Protection Scotland, SCIO SCO43410
GDPR	means the General Data Protection Regulation.
Responsible Person	means Board of Trustees / Clare Carruthers.

Data protection principles

The Charity 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.”

General provisions

- a) This policy applies to all personal data processed by the Charity.
- b) The Responsible Person shall take responsibility for the Charity’s ongoing compliance with this policy.
- c) This policy shall be reviewed at least annually.
- d) The Charity shall register with the Information Commissioner’s Office as an organisation that processes personal data.

Lawful, fair and transparent processing

- a) Individuals have the right to access their personal data and any such requests made to the charity shall be dealt with in a timely manner.

Lawful purposes

- a) All data processed by the charity must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests ([see ICO guidance for more information](#)).
- b) The Charity shall note the appropriate lawful basis in the Register of Systems.
- c) Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- d) 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 the Charity’s systems.

Data minimisation

- a) The Charity shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- b) When you become a member of the Charity or come to one of our events, we would like you to be added to our mailing list. We use our mailing list to contact you for our events, when your membership needs to be renewed, to receive our newsletter, to provide additional information to check our records are correct and to check every now and again that you are happy and satisfied with the service we provide you.

- c) The Charity also produces delegates lists when you attend our events. The list will contain your name and your organisation. We will seek permission from you when you register for an event.

Accuracy

- a) The Charity shall take reasonable steps to ensure personal data is accurate.
- b) 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.

Archiving / removal

- a) To ensure that personal data is kept for no longer than necessary, the Charity shall put in place an archiving policy for each area in which personal data is processed and review this process annually.
- b) The archiving policy shall consider what data should/must be retained, for how long, and why.
- c) The Charity will keep your details for five years after your consent. After that we will remove your details from our systems.

Security

- a) The Charity shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- b) 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.
- c) When personal data is deleted this should be done safely such that the data is irrecoverable.
- d) 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, the Charity shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO ([more information on the ICO website](#)).

END OF POLICY

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