

DATA PROTECTION POLICY

Contents

Introduction	1
Definitions	1
Data protection principles	2
General provisions	2
Lawful, fair and transparent processing	3
Lawful purposes	3
Data minimisation	4
Accuracy	4
Archiving / removal	4
Security	4
Rights of Data Subjects	5
Breach	5

Introduction

The Charity is committed to controlling and processing data in accordance with its responsibilities under the GDPR. This Policy sets out these responsibilities.

Definitions

Charity means Summer Hype, a registered charity with Registered Charity Number 1203540

GDPR means the UK General Data Protection Regulation

Responsible Person means Maia Cohen-Lask, a trustee of the Charity

Data protection principles

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

This policy applies to all personal data processed by the Charity.

The Responsible Person shall take responsibility for the Charity’s ongoing compliance with this policy.

This policy shall be reviewed at least annually.

Lawful, fair and transparent processing

To ensure its processing of data is lawful, fair and transparent, the Charity shall maintain a Privacy Notice. The Privacy Notice shall be reviewed at least annually.

Because of the nature of the Charity's work, much of the data processed will be children’s data. Therefore, as part of our commitment to fair processing of data, our Privacy Notice and accompanying procedures will be designed mindful of Recital 38 of the GDPR: Children merit specific protection with regard to their personal data, as they may be less aware of the risks, consequences and safeguards concerned and their rights in relation to the processing of personal data.

In relation to sharing of data, we follow the approach in the [ICO's Data Sharing Code of Practice](#) (with particular reference to the section: Data Sharing and Children).

Lawful purposes

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](#)).

The Charity shall note the appropriate lawful basis for processing data in relation to different categories of individuals in the Privacy Notice.

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 the person is under 13, systems are in place to ensure that parental consent is obtained. 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.

Where legitimate interests are relied upon as a lawful basis for processing data, we take responsibility for identifying the risks and consequences of the processing, and put age appropriate safeguards in place.

The Charity will, on occasion, have cause to process Special Category Data (as defined in Article 9 of the GDPR). The Charity shall note the applicable conditions for processing this data in the Privacy Notice.

Data minimisation

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.

The Privacy Notice will set out, for different categories of individuals, the type of data we control and its purpose.

Special consideration will be given to ensuring the minimisation of Special Category data. This will be reflected in the relevant procedures in the Privacy Notice.

Accuracy

The Charity shall take reasonable steps to ensure personal data is accurate and up to date. These shall be specified in the Privacy Notice.

Archiving / removal

To ensure that personal data is kept for no longer than necessary, the Charity shall put in place an archiving procedure for each area in which personal data is processed and review this process annually.

The archiving procedure shall consider what data should/must be retained, for how long, and why. This shall be set out in the Privacy Notice.

Security

The Charity shall ensure that personal data is stored securely using modern cloud data storage.

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 will be done safely such that the data is irrecoverable.

Rights of Data Subjects

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. These rights will be specified in the Privacy Notice.

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 immediately inform the Responsible Person.

The Responsible Person will: keep a log of their investigation into the data breach; give instructions to relevant persons in the Charity to contain the breach; and assess the risk of harm to the individuals affected by the breach.

- a. If a breach is likely to result in a risk to the rights and freedoms of individuals, the Responsible Person will inform the ICO within 72 hours of the breach.
- b. If a breach is likely to result in a high risk to the rights and freedoms of individuals, the Responsible Person will inform the people concerned without delay.

This decision will be documented.

This policy was adopted by: Summer Hype (*name of provider*)

On: 30/11/2023

Date to be reviewed: 30/11/2024

Signed on behalf of the provider:



Name of signatory: Emma Mittelman

Role of signatory: Co-Chair of Summer Hype