



DON'T TONE ALONE C.I.C. DATA PROTECTION POLICY AND PRIVACY NOTICE

POLICY STATEMENT

1. In the provision of its services, DON'T TONE ALONE C.I.C. (DTA C.I.C.) may receive personal data from or about service beneficiaries, employees, volunteers, “bank” trainers, job applicants and others (together “Stakeholders”).
2. Personal data is any information that relates to a living, identifiable person. This data can include names, contact details, and other information.
3. For the purpose of DTA C.I.C.’s projects and services they are currently controllers of personal data registered with the Information Commissioners Office (ICO) and determines how personal data collected is processed. The word ‘process’ covers most things that can be done with personal data, including collection, storage, use and destruction of that data.
4. It is DTA C.I.C.’s policy that all personal data, however received, is treated in accordance with CCC’s obligations under the General Data Protection Regulation (Regulation (EU) 2016/679) (the “GDPR”).
5. In its processing of personal data, DTA C.I.C. will: a. comply with the law, in particular the GDPR; b. respect individual’s rights and wishes; c. be open and honest with the individual whose data is held; d. provide training and support for staff and volunteers who handle personal data so they can act confidently and consistently in accordance with DTA C.I.C.’s obligations and the obligations of any organisation or body who contracts DTA C.I.C.; and e. store information securely, ensuring that no unauthorised persons have access to personal data.

WHY AND HOW PERSONAL DATA IS COLLECTED

6. DTA C.I.C. receives personal data in order to: 2 April 2018 SLH/AL a. contact DTA’s service beneficiaries and provide services to these beneficiaries; b. fulfil its contractual obligations under its contracts; and c. maintain employment and HR records.
7. In relation to 6.b. above, DTA C.I.C. has an obligation to provide certain data pursuant to its contractual obligations with organisation but all such data is anonymised before being provided.

CONSENT

8. All existing Stakeholders will be informed of this policy in a written communication prior to or shortly after the enforcement of the GDPR on 25 May 2018. At times, DTA C.I.C. may further process data, which it has already collected. DTA C.I.C. will only do this if the new purpose for processing it further is compatible with the original purpose that the data was collected for.
9. When personal data will be directly collected and received from any new Stakeholders, they will be asked to give their express consent for the processing of their data and will be informed about this data protection policy, which will be provided on request by DTA C.I.C.

SHARING OF PERSONAL DATA

10. DTA C.I.C. does not share personal data with third parties except where: a. the express consent of the individual has been obtained; or b. where permitted under the GDPR.

11. As set out at POINT 7 above, DTA C.I.C. has an obligation to provide certain data (such as the number of beneficiaries worked with) pursuant to contractual obligations for monitoring and evaluation purposes, such as with local authorities. However, all such data which may reveal the identity of individuals is anonymised before being provided except where expressed consent has been given.

SECURITY AND STORAGE OF PERSONAL DATA

12. The personal data of clients is confidential and may only be shared between staff and volunteers as necessary and appropriate. 3 April 2018 SLH/AL

13. Client personal data and case notes are stored on electronically and password protected DTA C.I.C. databases. All paper records are stored in individual client files in lockable cabinet/cupboards.

14. Personnel records are kept securely with DTA C.I.C.'s director.

15. Staff should always be cautious in their response to telephone enquiries and Client personal data should not be released to third parties unless consent has been obtained. When giving or receiving information by telephone, either mobile or landline, staff should be sensitive to who may be listening and ensure the conversation remains as private and confidential as possible.

16. Computer screen displays must be located out of public view. Staff should ensure that when they are away from their computers, phones or tablets, they log off or password protect their screens.

RETENTION PERIODS AND DELETION OF DATA

17. Client personal data contained on DTA C.I.C.'s project's database will be deleted once the case has been inactive for two years. Paper files will be shredded once the case has been inactive for two years.

18. Application forms for unsuccessful applicants to DTA C.I.C. will be deleted (if in electronic form) and shredded (if in paper form) after one year.

19. Employee records will be deleted (if in electronic form) and shredded (if in paper form) six years after employment has ceased.

20. Payroll and tax information will be deleted (if in electronic form) and shredded (if in paper form) after ten years.

DATA PROTECTION OFFICER

21. DTA C.I.C.'s Managing Director, has overall responsibility for implementing and monitoring DTA C.I.C.'s data protection policy.

22. Under the GDPR, individuals have the following rights in relation to their personal data processed by DTA C.I.C.: a. To be informed about their personal data is handled; 4 April 2018 SLH/AL b. To gain access to their personal data; c. To have errors or inaccuracies in their data changed; d. To have their personal data erased, in limited circumstances; e. To object to the processing of their personal data for marketing purposes; and f. To restrict the processing of their personal data, in limited circumstances.

23. Any questions or concerns about this policy or the way in which personal data is held or processed should be directed to Don't Tone Alone C.I.C. using the following contact details: Post: Don't Tone Alone C.I.C., 85 Great Portland Street, W1W 7LT Email: info@donbttonealone.co.uk

24. Individuals have a right to complain to the Information Commissioner's Office (ICO) about the way in which DTA C.I.C. processes their personal data (<https://ico.org.uk/>).

COOKIES ON DTA C.I.C.'s WEBSITE

25. Cookies are small files which websites store on a computer and which contain various types of information about a person's visit to a website. Cookies can record information about how a person browses the Internet. They are not viruses or malicious software.

26. DTA C.I.C. does not store cookies on a person's computer without their consent, unless they have the sole purpose of carrying out the transmission of communications or they are strictly necessary for providing an online service.

27. Individuals can restrict or block cookies which are set by any website through their browser settings. Information about this can be found using the following link <https://ico.org.uk/forthepublic/online/cookies>.

28. Restricting or disabling cookies may impact the functioning of parts of DTA C.I.C. website but are unlikely to do so. 5 April 2018 SLH/AL

29. DTA C.I.C. website currently does not use any cookies as found by www.cookie-checker.com.