

## **Att10tive CIC GDPR compliance policy**

### **The management and collection of information**

Data protection principles & policy of Att10tive

Att10tive Social Enterprise will collect data primarily for two primary purposes;

1. To ensure people can be contacted and kept informed of projects, opportunities, activities, events and training.
2. To maintain a record of participants for funders and clients. This data will be the name and first three letters of their post code. In some circumstances participants may be asked for their age and if they belong to a deprived group or live in a deprived area.

Information collected can be used to demonstrate involvement with Att10tive.

Participants are advised that we will take photographs of all our participants at events, workshops and meetings. The pictures can be used either on our website or passed on to partners and funders to show involvement in our activities.

Anyone attending our events will be advised that if they do not want their picture taken then should make themselves known and be excluded from any photographs.

Att10tive is committed to processing data in accordance with its responsibilities under the GDPR. 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. The details will be solely for use by Att10tive and may only be shared with specific funders. Not further processing or sharing will occur without specific permission
- C) All data will only be collected for is necessary in relation to the purposes for which they are processed;
- D) No address details will be collected from participants who are under the age of 16
- E) No personal address or personal information with be shared with a third party without their knowledge, except the post code / area for funders.

- F) Steps will 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;
- G) Kept and 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.”

## **2. General provisions**

- A) This policy applies to all personal data processed by Att10tive.
- B) The Responsible Person shall take responsibility for Att10tive’s ongoing compliance with this policy.
- C) This policy shall be reviewed at annually.

## **3. Lawful, fair and transparent processing**

- A) To ensure its processing of data is lawful, fair and transparent, Att10tive shall maintain a Register of people who participate in our activities.
- B) The Register shall be reviewed annually.
- C) Individuals have the right to access their personal data and any such requests made to Att10tive shall be dealt with in a timely manner.

## **4. Lawful purposes**

- A) All data processed by Att10tive must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests
- B) Att10tive shall note the appropriate lawful basis whilst collecting data
- 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 Att10tive ’s systems.

## **5. Accuracy & Security**

- A) Att10tive 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.
- C) Att10tive shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- D) 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.
- E) When personal data is deleted this should be done safely such that the data is irrecoverable.

## **7. 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, Att10tive shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO

**Signed:**     *M Neuville*          **Date: 15<sup>th</sup> August 2024**

**Next Reveiw date 14<sup>th</sup> August 2026**