Data Protection Policy

**1. Data protection principles**

**WOMEN’S**TEC is committed to processing data in accordance with its responsibilities under the General Data Protection Regulation (GDPR).

Article 5 of the GDPR requires that personal data shall be:

* Processed lawfully, fairly and in a transparent manner in relation to individuals;
* 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;
* Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
* 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;
* 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
* 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**

* This policy applies to all personal data processed by **WOMEN’S**TEC.
* The Quality Assurance Officer shall take responsibility for **WOMEN’S**TEC’s ongoing compliance with this policy.
* This policy shall be reviewed at least annually.

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

* To ensure its processing of data is lawful, fair and transparent, **WOMEN’S**TEC shall maintain a Record of Processing Activities.
* The Record of Processing Activities shall be reviewed at least annually.
* Individuals have the right to access their personal data and any such requests made to **WOMEN’S**TEC shall be dealt with in a timely manner.

**4. Lawful purposes**

* All data processed by **WOMEN’S**TEC 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](https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/)).
* **WOMEN’S**TEC shall note the appropriate lawful basis in the Record of Processing Activities.
* 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 communications are sent to individuals based on their consent, the option for the individual to withdraw their consent should be clearly available and systems should be in place to ensure such withdrawal is reflected accurately in **WOMEN’S**TEC’s systems.

**5. Data minimisation**

* **WOMEN’S**TEC shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

**6. Accuracy**

* **WOMEN’S**TEC shall take reasonable steps to ensure personal data is accurate.
* 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.

**7. Archiving / removal**

* To ensure that personal data is kept for no longer than necessary, **WOMEN’S**TEC shall put in place a retention policy for each area in which personal data is processed and review this process annually.
* The retention policy shall consider what data should/must be retained, for how long, and why.

**8. Security**

* **WOMEN’S**TEC shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
* 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 should be done safely such that the data is irrecoverable.
* Appropriate back-up and disaster recovery solutions shall be in place.

**9. Data Sharing**

**WOMEN’S**TEC shall ensure that personal data is only shared with third parties where one of the following conditions takes place:-

* The individual has given their consent to **WOMEN’S**TEC.
* Where **WOMEN’S**TEC is obliged to do so either legally (e.g. government ethnic or religious monitoring) or through legitimate interests (i.e. funders – where possible personal data will be pseudonymised).
* To prevent serious harm to a third party, in this case the PSNI will be contacted.
* To prevent a criminal act from taking place, in this case the PSNI will be contacted.
* To protect the interests of the individual, i.e. if concerns arose where a person was thought to be a risk to himself or herself or another, in this case it would be referred to the relevant safeguarding body.

**10. 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, **WOMEN’S**TEC 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](https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/personal-data-breaches/)).

Authorised by **WOMEN’S**TEC Chief Executive and Board of Directors:

Signed:                                                                             Signed:

Position:                                                                           Position:

Date: Date: