

Data Protection Policy

Exploring Educational Opportunities CIC

Last updated	March 2019
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1. Data protection principles

Exploring Educational Opportunities CIC 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.”

2. General provisions

- a. This policy applies to all personal data processed by Exploring Educational Opportunities CIC.
- b. The Responsible Person shall take responsibility for the CIC’s ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.

3. Lawful, fair and transparent processing

- a. To ensure its processing of data is lawful, fair and transparent.
- b. Individuals have the right to access their personal data and any such requests shall be dealt with in a timely manner.

4. Lawful purposes

- a. All data processed by Exploring Educational Opportunities CIC will be done on the basis of consent.
- b. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- c. 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.

5. Data minimisation

- a. Exploring Educational Opportunities CIC 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

- a. Exploring Educational Opportunities CIC shall take reasonable steps to ensure personal data is accurate.

7. Archiving / removal

- a. To ensure that personal data is kept for no longer than necessary, Exploring Educational Opportunities CIC shall archive data after two years and remove it after three years.

8. Security

- a. Exploring Educational Opportunities CIC 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 will not be available to third parties.
- c. When personal data is deleted this should be done safely such that the data is irrecoverable.

9. 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, Exploring Educational Opportunities CIC shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO

END OF POLICY