

# Data Protection Policy

Crickley Hill Archaeological Trust

Last updated	8th February 2021
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## Definitions

<b>Charity</b>	means The Crickley Hill Archaeological Trust, a registered charity.
<b>GDPR</b>	means the General Data Protection Regulation.
<b>Responsible Person</b>	means Stephen Vaughan.
<b>Register of Systems</b>	means a register of all systems or contexts in which personal data is processed by the Charity.

### 1. Data protection principles

The Charity 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 the Charity.
- b. The Responsible Person shall take responsibility for the Charity's ongoing compliance with this policy.
- c. This policy shall be reviewed at least once every two years.
- d. The Charity shall register with the Information Commissioner's Office as an organisation that processes personal data.

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

- a. To ensure its processing of data is lawful, fair and transparent, the Charity shall maintain a Register of Systems.
- b. The Register of Systems shall be reviewed at least annually.
- c. Because the personal data held by the Charity is solely for the purpose of archiving in the public interest, the Charity is exempt from the right of individuals to access their personal data.

## **4. Lawful purposes**

- a. All data processed by the charity must be done on the lawful basis of legitimate interest.
- b. The Charity shall note the appropriate lawful basis in the Register of Systems.
- c. Since all the personal data processed by the Charity pre-dates 28th October 1998, opt-in consent is not required and will not be sought or kept.

## **5. Data minimisation**

- a. 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.
- b. The Charity shall ensure that it takes no steps to create meta-data or searchable records of the personal data processed.

## **6. Accuracy**

- a. The Charity shall take reasonable steps to ensure personal data is accurate.
- b. Because the data processed by the Charity is for the purpose of archiving in the public interest, no steps are required to ensure that personal data is kept up to date.

## **7. Archiving / removal**

- a. Because the data processed by the Charity is for the purpose of archiving in the public interest, no removal of data will be regularly conducted and the contents of the archive will in effect continue in perpetuity.
- b. The provisions of GDPR for individuals to request correction and deletion of data processed by the Charity do not apply in the case of data processed for archiving in the public interest. The Charity exerts its right to exemption from these provisions. Notwithstanding this, the Charity will make provision for reasonable requests for correction or removal for individuals, and reserves the

right to conform to such requests or not. Such judgement will be informed by the intent to maintain the archive in the best state possible to allow enduring historical and scientific research.

## **8. Security**

- a. The Charity shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- b. Because the personal data is part of an archive maintained for archive in the public interest, access to the data shall not be limited and be generally available.
- c. Appropriate back-up and disaster recovery solutions shall be in place.

## **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, the Charity shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the the Information Commissioner's Office.

END OF POLICY