



POLICIES & PROCEDURES

Pyramid of Arts

Data Protection Policy

Pyramid of Arts is committed to following the principles and provisions of the Data Protection Act (1998) and the General Data Protection Regulations (2016) in ensuring that all personal information held by the organisation is handled in a responsible and secure manner which respects the rights and privacy of the individual concerned.

These laws control what can lawfully be done with information by a 'data controller' (anyone who obtains personal information about others) and gives individuals rights in controlling how data about them is obtained, used, stored and managed.

Pyramid of Arts is a data controller because we need to store and share personal information about individuals in order to ensure safety, effective communication and for monitoring purposes.

The ways in which data is stored and used by Pyramid of Arts is detailed in the **Privacy Statement**.

Our obligations

All the personal data we hold must be:

1. Fairly and lawfully processed

Any data we handle is managed in accordance with the principles outlined in the Privacy Statement and this Data Protection Policy to ensure fair and lawful processing

2. Obtained and processed for limited purpose;

We only ask for and retain personal information which is needed:

- to safely and effectively operate the organisation
- for monitoring purposes to ensure we are meeting our responsibilities in terms of Equal Opportunities
- to produce anonymous statistical information about our organisation for the purpose of attracting funding or reporting to current funders

We will only use personal information for the specified purpose.

3. Adequate, relevant and not excessive

We will ensure we maintain the balance of having enough information to safely and effectively operate, without asking for more than we need.

4. Accurate

We will do our best to ensure that all data recorded is accurate. When notified of any changes or corrections to personal information we will make amendments as soon as possible and always within the legal limit of 28 days.

5. Not kept longer than necessary

We keep personal data for everyone who is active in our organisation. We review the data we hold annually, and will securely delete data relating to any person who has not been active for two years.

In the case of employees, we will retain details and records of employment in accordance with statutory requirements and for as long as deemed necessary should legal proceedings arise.

6. Secure

Data will be kept in a secure system whether manual or computerised to the best of our ability at all times. See the **Privacy Statement** for further information on data storage.

7. Processed in accordance with the data subject's rights

Anyone we hold personal information about is a 'data subject' and they have the right to see what information we hold, and in some circumstances stop us from using it. Please see below.

8. Protected through appropriate technical and organisational measures

We will ensure that there are appropriate procedures in place to protect personal data. This relates to practical measures such as using lockable filing cabinets and password protecting devices; to making sure that staff have adequate training to understand their responsibilities and obligations and to ensuring there are security procedures in place for data processing.

9. Not transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection.

We will ensure that there is adequate protection in place regarding the rights and freedoms of data subjects if and when data is transferred outside the European Economic Area. This may happen if Pyramid of Arts uses online services that are hosted in other countries. More information about the online services we use can be found in the **Privacy Statement**.

The rights of the 'data subject'

- to be told whether any personal data is being processed
- to be given a description of the personal data, the reasons it is being processed, and whether it will be given to any other organisations or people
- to be given a copy of the information comprising the data; and given details of the source of the data (where this is available)
- to object to processing that is likely to cause or is causing damage or distress
- to prevent processing for direct marketing
- to object to decisions being taken by automated means
- a right to have inaccurate personal data rectified, and in certain circumstances data blocked, erased or destroyed
- to claim compensation for damages caused by a breach of the Act

Please see our **Privacy Statement** for information on how to exercise your rights as a data subject.

Who to contact

The Data Protection Officer, Pyramid of Arts, Unit 68B Barkston House, Croydon Street, Leeds LS11 9RT