



Cobras AP

DATA PROTECTION POLICY

Definitions

- **Charity** – Creative Minds CIC, a community interest company
- **GDPR** – General Data Protection Regulation
- **Responsible Person** – Dan Gaze
- **Register of Systems** – 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:

- Processed lawfully, fairly and in a transparent manner
- Collected for specified, explicit and legitimate purposes and not further processed in an incompatible manner
- Adequate, relevant and limited to what is necessary
- Accurate and, where necessary, kept up to date
- Kept in a form that permits identification of individuals for no longer than necessary
- Processed securely, including protection against unauthorised or unlawful processing, accidental loss, destruction or damage

2. General Provisions

- This policy applies to all personal data processed by the Charity
- The Responsible Person is accountable for ongoing compliance
- The policy shall be reviewed at least annually
- The Charity shall be registered with the Information Commissioner's Office

3. Lawful, Fair and Transparent Processing

- The Charity shall maintain a **Register of Systems**

- The Register will be reviewed annually
- Individuals have the right to access their personal data, and all such requests will be handled promptly

4. Lawful Purposes

- All data must be processed under one of the six lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests
- Lawful bases must be recorded in the Register of Systems
- When relying on **consent**, opt-in consent must be documented
- Individuals must have a clear option to revoke consent, and systems must reflect revocation promptly

5. Data Minimisation

- The Charity shall ensure that data collected is adequate, relevant, and limited to what is necessary for the intended purpose
- [Further specific considerations relevant to systems used by the Charity to be added here]

6. Accuracy

- The Charity will take reasonable steps to ensure data is accurate
- Where appropriate, procedures will be implemented to keep data up to date
- [Additional system-specific accuracy considerations to be added here]

7. Archiving and Data Removal

- An **archiving policy** shall be maintained and reviewed annually
- The policy must outline:
 - What data is retained
 - How long it is retained
 - The justification for retention

8. Security

- Data shall be stored securely using modern, up-to-date software
- Access to personal data is limited to staff who require it
- Measures will be taken to prevent unauthorised access or sharing
- When deleting personal data, it must be done securely and irreversibly
- Backup and disaster recovery solutions must be in place

9. Data Breach

- In the event of a breach involving personal data (e.g., destruction, loss, alteration, disclosure or access), the Charity shall promptly assess the risk to individuals' rights and freedoms
- Appropriate actions and notifications will be taken in accordance with GDPR requirements

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