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

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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

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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

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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

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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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Last reviewed: June 2025