

Data Protection Policy

Wolves Play Café Community Interest Company

Last updated	January 2021
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Definitions

Wolves Play Café Community Interest Company	A community interest company limited by guarantee
GDPR	means the General Data Protection Regulation.
Responsible Person	means Lisa Stallard.
Register of Systems	means a register of all systems or contexts in which personal data is processed by Wolves Play Café Community Interest Company, named Document Controller

1. Data protection principles

Wolves Play Café Community Interest Company 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 Wolves Play Café Community Interest Company.
- b. The Responsible Person shall take responsibility for Wolves Play Café Community Interest Company's ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.
- d. Wolves Play Café Community Interest Company shall register with the Information Commissioner's Office when appropriate 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, Wolves Play Café Community Interest Company shall maintain a Register.
- b. The Register shall be reviewed at least annually.
- c. Individuals have the right to access their personal data and any such requests made to Wolves Play Café Community Interest Company shall be dealt with in a timely manner.

4. Lawful purposes

- a. All data processed by Wolves Play Café Community Interest Company must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests ([see ICO guidance for more information](#)).
- b. Wolves Play Café Community Interest Company shall note the appropriate lawful basis in the Register.
- c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- d. 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 in Wolves Play Café Community Interest Company's systems.

5. Data minimisation

- a. Wolves Play Café Community Interest Company 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. Wolves Play Café Community Interest Company will ask for names of adults, names and ages of children, any medical issues that need to be highlighted and adult contact details to ensure it can operate successfully and with care.

6. Accuracy

- a. Wolves Play Café Community Interest Company shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

7. Archiving / removal

- a. To ensure that personal data is kept for no longer than necessary, Wolves Play Café Community Interest Company shall put in place an archiving policy for each area in which personal data is processed and review this process annually.
- b. The archiving policy shall consider what data should/must be retained, for how long, and why.
- c. This archiving and removal policy means personal data will be kept for 12 months unless a repeat visit occurs in which case this will restart a 12 month period or consent is given to add to a mailing list.
- d. Anyone who wishes to remove their data at any point can contact Wolves Play Café Community Interest Company at info@wolvesplaycafe.org.

8. Security

- a. Wolves Play Café Community Interest Company 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 appropriate security should be in place to avoid unauthorised sharing of information.
- c. When personal data is deleted this should be done safely such that the data is irrecoverable.
- d. 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, Wolves Play Café Community Interest Company shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO ([more information on the ICO website](#)).

END OF POLICY

*This Policy was first created in February 2019 and is reviewed every year henceforth.
Signed copies available to view on request.*