

Menter yr Eagles: Data Protection Policy

This policy describes how Menter yr Eagles processes the personal data of our members, staff, workers, customers, clients, suppliers, volunteers and relevant third parties.

1. Data protection principles

Menter yr Eagles 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;
- b. collected for specified, explicit and legitimate purposes only;
- 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, corrected or deleted;
- 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;
- 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 Menter yr Eagles.
- b. We will appoint a Responsible Person (Data Protection Officer) to take responsibility for Menter yr Eagles's ongoing compliance with this policy.

3. Lawful, fair and transparent processing

- a. To ensure our processing of data is lawful, fair and transparent, we shall maintain a Register of processing activities and Privacy Notices.
- 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 us shall be dealt with in a timely manner.

4. Lawful purposes

- a. All data processed by us will be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests.
- b. We shall note the appropriate lawful basis in all Privacy Notices and in the Register of processing activities.
- 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 consent is relied upon as a lawful basis, the option for the individual to revoke their consent will be clearly available and such revocation will be reflected accurately in the our systems.

5. Data minimisation

a. We shall ensure that personal data are adequate, relevant and always limited to what is necessary in relation to the purposes for which they are processed.

6. Accuracy

a. We shall take reasonable steps to ensure personal data is accurate.

b. Where necessary for the lawful basis on which data is processed, we will ensure that personal data is kept up to date.

7. Archiving

a. To ensure that personal data is kept for no longer than necessary, we shall maintain 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.

8. Security

a. We 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 it will be done safely such that the data is irrecoverable.

d. Appropriate back-up and disaster recovery solutions will 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, we shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO.

This policy shall be reviewed at least annually.

Responsible person (DPO): Grisial Llewelyn

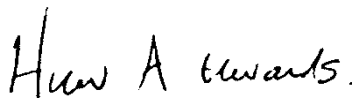
Policy adopted 17 July 2023

Signed (Chair)



[Grisial Llewelyn]

Signed (Member of Management Committee)



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