



Data Protection Policy

Introduction

We hold personal data about paid employees, volunteers, members, customers, donors, suppliers and other individuals for a variety of purposes. This policy sets out how we seek to protect personal data and ensure that our Staff and volunteers understand the rules governing their use of personal data to which they have access in the course of their work. In particular this policy requires staff and volunteers to ensure that the Data Controller is consulted before any significant new data processing activity is initiated to ensure that relevant compliance steps are addressed.

Definitions

Personal data -

Information relating to identifiable individuals, such as members, customers, participants, donors, job applicants, current and former employees and volunteers, agency, contract and other staff, and suppliers.

Personal data we gather may include individuals' contact details, educational background, financial and pay details, education and CV.

Scope

This policy applies to all our workforce. Staff, volunteers and trustees must be familiar with this policy and comply with its terms.

Who is responsible for this policy?

Our Data Controller has overall responsibility for this policy with the Museum Administrator managing it on a day-to-day basis.

Our policy

We will process personal data in compliance with these data protection principles:

- Specific and lawful purposes
- Adequate, relevant and not excessive
- Accurate and, where necessary, kept up to date
- Keep no longer than is necessary
- Rights of Data Subjects
- Appropriate technical and organisational security measures

Fair and lawful processing

We will process personal data fairly and lawfully in accordance with individuals' rights. This generally means that we should not process personal data unless the individual whose details we are processing has consented to this happening or we have another legal basis for processing.

The processing of all data must be:



- Necessary to deliver our services
- In our legitimate interests and not unduly prejudice the individual's privacy
- In most cases this provision will apply to routine business data processing activities.

Conditions for processing

We will ensure any use of personal data is justified using at least one of the conditions for processing and this will be specifically documented. All staff who are responsible for processing personal data will be aware of the conditions for processing. The conditions for processing will be available to data subjects in the form of a privacy notice which will be provided to all data subjects when data is collected and is available on our website.

Sensitive personal data

If we are required to process sensitive personal data we will require the data subject's *explicit* consent to do this unless exceptional circumstances apply or we are required to do this by law (e.g. to comply with legal obligations to ensure health and safety at work). Any such consent will need to clearly identify what the relevant data is, why it is being processed and to whom it will be disclosed.

Accuracy and relevance

We will ensure that any personal data we process is accurate, adequate, relevant and not excessive, given the purpose for which it was obtained. We will not process personal data obtained for one purpose for any unconnected purpose unless the individual concerned has agreed to this or would otherwise reasonably expect this.

Data retention

We will retain personal data for no longer than is necessary. What is necessary will depend on the circumstances of each case, taking into account the reasons that the personal data was obtained, but should be determined in a manner consistent with our data retention guidelines.

Rights of Data Subjects

We will ensure that the rights of data subjects as set out in the data protection legislation are respected and adhered to:

subject access

- to have inaccuracies corrected
- to have information erased
- to prevent direct marketing

Data security

We will ensure that all personal data is held secure against loss or misuse.

Where other organisations process personal data as a service on our behalf, the Data Controller will establish what, if any, additional specific data security arrangements need to be implemented in contracts with those third party organisations.



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Finding out more

To find out what information Stromness Museum holds about you, please contact
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