



Data Protection Policy

Definitions

Organisation	Means Community Interest Luton, registered CIC and CIO
GDPR	Means the General Data Protection Regulation.
Responsible People	Means Community Interest Luton Management Team.
Register of Systems	Means a register of all systems or contexts in which personal data is processed by Community Interest Luton.

1. Data protection principles

Community Interest Luton 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 is 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 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

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- 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 Community Interest Luton.
- b. The person with overall responsibility for data protection compliance within Community Interest Luton is **Aimee Clarke**, who oversees data protection practices, compliance, and reporting of any data protection concerns or breaches.
- c. This policy shall be reviewed annually

2.A. Data Controller and Data Processor Roles

For the purposes of the Data Protection Act 2018 and UK General Data Protection Regulation (UK GDPR), Community Interest Luton acts as the Data Controller for all personal data it collects and processes in the course of its activities.

As Data Controller, Community Interest Luton determines the purposes and means of processing personal data and is responsible for ensuring that such processing is lawful, fair and transparent.

Where third-party organisations process personal data on behalf of Community Interest Luton, they will act as Data Processors. Community Interest Luton will ensure that appropriate data processing agreements are in place with all Data Processors, setting out their responsibilities, confidentiality requirements, and data security obligations in line with UK GDPR.

3. Lawful, fair and transparent processing

- a. To ensure its processing of data is lawful, fair and transparent, Community Interest Luton shall maintain a Register of Systems.
- b. The Register of Systems shall be reviewed at least annually.
- c. Individuals have the right to access their personal data and any such requests made to Community Interest Luton shall be dealt with in a timely manner.

4. Lawful purposes

- a. All data processed by Community Interest Luton must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests
- b. Community Interest Luton shall note the appropriate lawful basis in the Register of Systems.

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- 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 Community Interest Luton's systems.

5. Data minimisation

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

6. Accuracy

- a. Community Interest Luton retains personal data only for as long as it is necessary for the purposes for which it was collected, in accordance with the Data Protection Act 2018 and UK GDPR.
- b. Unless a longer retention period is required by law or regulatory guidance, **personal data will be retained for a period of seven (7) years.**
- c. This retention period applies to safeguarding records, client records, staff and volunteer records, and related correspondence, unless specific legal or contractual obligations require otherwise.
- d. At the end of the retention period, personal data will be **securely deleted or destroyed** in a manner that ensures it cannot be reconstructed or retrieved.
- e. Retention periods and disposal practices will be reviewed annually to ensure they remain appropriate and lawful

7. Archiving / removal

- a. To ensure that personal data is kept for no longer than necessary, Community Interest Luton 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.

8. Security

- a. Community Interest Luton 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.

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- 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, Community Interest Luton shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO.

Mostaque Koyes
Director

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Review Period: Annually