

# THE LONDON BALLET CIRCLE

## DATA PROTECTION POLICY

The London Ballet Circle (LBC) is committed to processing data in accordance with its responsibilities under General Data Protection Regulations (GDPR).

### 1. DATA PROTECTION PRINCIPLES

Article 5 of the GDPR requires that personal data shall be:

1. processed lawfully, fairly and in a transparent manner in relation to individuals;
2. collected for specified, explicit and legitimate purposes and not processed further in a manner that is incompatible with those purposes; [further processing for archiving purposes in the public interest, for scientific or historical research purposes, or for statistical purposes shall not be considered to be incompatible with the initial purposes];
3. adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed;
4. accurate and, where necessary, kept up to date, with every reasonable step being taken to ensure that personal data that is inaccurate, having regard to the purposes for which it is processed, is erased or rectified without delay;
5. kept in a form which permits the identification of data subjects for no longer that is necessary for the purposes for which the personal data is 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, for scientific or historical research purposes, or for statistical purposes, subject to the implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals]; and
6. 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 organisational measures.

### 2. GENERAL PROVISIONS

This policy applies to all personal data processed by the LBC.

It is incumbent on the Trustees to ensure the LBC's ongoing compliance with this policy.

This policy will be reviewed at least annually.

The LBC is not required to be registered with the Information Commissioner's Office.

### 3. LAWFUL, FAIR AND TRANSPARENT PROCESSING

The LBC will ensure that its processing of data is lawful, fair and transparent.

Individuals have the right to access their personal data and any such requests made to the LBC will be dealt with in a timely manner in accordance with the LBC's Privacy Policy.

### 4. LAWFUL PURPOSES

All data processed by the LBC will be done on one of the following lawful bases: consent; contract; legal obligation; vital interests; or public task or legitimate interest

Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent will be kept with the personal data.

The option for individuals to revoke their consent is clearly stated in the LBC's Privacy Policy and procedures will ensure that such revocation is reflected accurately in the LBC's systems.

## **5. DATA MINIMISATION**

The LBC will ensure that the personal data it collects is adequate, relevant and limited to what is necessary for the required purposes.

## **6. ACCURACY**

The LBC will take all reasonable steps to ensure that personal data is accurate.

Where necessary for the lawful basis on which data is processed, personal data will be kept up to date.

## **7. ARCHIVING/REMOVAL**

The LBC will ensure that personal data is kept for no longer than necessary.

## **8. SECURITY**

The LBC will ensure that all personal data is stored securely, using modern software and that is kept up-to-date.

Access to personal data will be limited to personnel who need that access and appropriate security will avoid unauthorised sharing of information.

When personal data is deleted, this will be done in such a way as to ensure that the data is irrecoverable.

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, the LBC will promptly assess the risk to people's rights and freedoms and, if appropriate, report this breach to the Information Commissioner.

**Approved by Trustees:** 04/03/19    **Reviewed:** 03/03/20    **Next Review due:** March 2020 latest