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BEAT CARNIVAL DATA PROTECTION POLICY

Updated October 2018

Introduction

Beat Carnival needs to collect and use certain types of information about people with whom it conducts business. These people include current, past and prospective employees, suppliers, clients/customers and others with whom it communicates. All such personal information must be handled properly however it is collected, recorded and used whether on paper, in a computer or recorded on other material and there are safeguards to ensure this within the Data Protection Act 1998. The **General Data Protection Regulation** regulates the processing of personal data and replaces the Data Protection Act 1998. It became law on 25 May 2018 and places legal obligations on businesses to comply with a number of data protection principles. **See GDPR on Page 3**

Beat Carnival regards the lawful and correct treatment of personal information as very important to its successful operations and to maintaining confidence between Beat Carnival and those with whom it carries out business. Beat Carnival will ensure that it treats personal information lawfully and correctly.

This data protection policy ensures Beat Carnival
complies with data protection law and follows good practice
protects the rights of staff, customers and partners
is open about how it stores and processes individuals' data
protects itself from the risks of a data breach.

Principles of Data Protection

To this end, Beat Carnival fully endorses and will adhere to the data protection principles, as set out in the Data Protection Acts 1998 and 2018. Specifically, the principles require that personal information:

1. Shall be processed fairly and lawfully and, shall not be processed unless specific conditions are met;
2. Shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes;
3. Shall be adequate, relevant and not excessive in relation to the purpose for which they are processed;
4. Shall be accurate and, where necessary, kept up to date;
5. Shall not be kept for longer than is necessary for that purpose or those purposes;
6. Shall be processed in accordance with the rights of data subjects under this Act;
7. Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data;

8. Shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

Handling of Personal Information

Beat Carnival will, through appropriate management and the strict application of criteria and controls:

- Observe fully the conditions regarding the fair collection and use of personal information;
- Meet its legal obligations to specify the purposes for which information is used;
- Collect and process appropriate information and only to the extent that it is needed to fulfil operational needs or to comply with any legal requirements;
- Ensure the quality of information used;
- Apply strict checks to determine the length of time information is held;
- Ensure that the rights of people about whom the information is held can be fully exercised under the Act. These include the right to be informed that processing is being undertaken, the right of access to one's personal information, the right to prevent processing in certain circumstances and the right to correct, rectify, block or erase information which is regarded as wrong information;
- Take appropriate technical and organisational security measures to safeguard personal information;
- Ensure that personal information is not transferred abroad without suitable safeguards.

In addition, Beat Carnival will ensure that:

- Everyone managing and handling personal information understands that they are contractually responsible for following good data protection practice;
- Everyone managing and handling personal information is appropriately trained to do so and is appropriately supervised;
- Methods of handling personal information are clearly described, regularly assessed and evaluated. These shall include obtaining consent, data accuracy, reviews, security, storage and disposals, data exchange and transfers etc;
- Anybody wanting to make enquiries about handling personal information knows what to do;
- Queries about handling personal information are promptly and courteously dealt with;
- Performance in handling personal information is regularly assessed and evaluated. This shall include monitoring the processing of personal data, security breaches etc.

What Information Do We Collect?

Any information is collected and stored in accordance to the ***General Data Protection Regulation**.

We will collect information:

- When you register with us as a participant. This information will include your name, contact details and some data on your general health.
- If you enquire about our services or any of our programmes.
- If you email us, we'll have your name and email contact details.
- Photos and video from workshops & events. We only take images / footage of participants with consent.
- Employee data including Access NI CVs.

How Is Your Information Used?

Beat Carnival/ Beat Trading will never sell your personal data to third parties.

We may use your data:

- To contact you about upcoming events, changes to timetables related to a programme you or your child are registered for.
- To fulfil our contractual or legal obligations.
- For administration purposes including monitoring and evaluation and reporting to funders.
- To use photos to advertise programmes and events and for Beat archives.
- Video footage may be uploaded to Facebook and YouTube.

How Your Data Is Protected

Any data Beat Carnival/ Trading holds will be kept as secure as possible. Appropriate safeguards are in place for all information held, whether digital or analogue. We use Gmail as our email provider. They automatically encrypt all emails using TLS (Transport Layer Security) and this helps prevent others from reading our emails. We will never transfer, process or store your data outside of the European Economic Area.

***GDPR**

The General Data Protection Regulation regulates the processing of personal data and replaces the Data Protection Act 1998. It became law on 25 May 2018 and places legal obligations on businesses to comply with a number of data protection principles.

The GDPR introduces a number of changes to the concept of “consent” as a condition to lawful processing, as well as updating and revising the general principles of processing and the “legitimate interests” condition. Many of these changes formalise current best practise whilst others are more significant changes.

- Beat has conducted an information audit and documented what personal data is held, where it came from who we share it with, and what we do with it.
- Beat has identified the lawful bases for processing personal data and documented them.
- Beat has reviewed how we ask for and record consent and has systems to record and manage on going consent to ensure that it is freely given, specific, informed and that it is a clear indication that an individual has chosen to agree to the processing of their data and has the right of access to the data held or to withdraw consent.
- In the case of legitimate interests as the lawful basis for processing data we have fully considered and protected an individual’s rights and interests.

How Beat Carnival is complying with GDPR:

- by ensuring confidentiality, integrity and availability
- we have an accessible written Policy so that people know what information is collected and that it is collected and stored in accordance to the General Data Protection Regulation
- by ensuring security around customers’ / participants’ data
- by ensuring data minimisation
- by assessing and knowing what data belonging to people we hold, where it is held, for what purpose and how long for

- by handling people's data with care, only using it with the explicit consent of its owners, provide it to them upon request, and informing them promptly should it be compromised
- by identifying data risk
- by ensuring technology and systems protect data
- by having a data protection officer (DPO) staff role, responsible for compliance
- by taking an approach of “privacy by design” to manage data effectively under GDPR. Data collection processes designed from the ground up to be compliant. This includes running a privacy impact assessment on data to assess the risks it poses
- by being aware and then taking care if data is to be transferred outside the EU, so that it does not travel into an environment where data is less protected. We do not and do not foresee that data will be transferred outside Europe
- by keeping detailed records of our actions to satisfy any regulatory audits.

Adhering to Standards

We are aware of and take regard to the 'ISMS Family of Standards' – the ISO/IEC 27000-series for example:

We tell people that we will collect information:

- When you register with us as a participant. This information will include your name, contact details and some data on your general health.
- If you enquire about our services or any of our programmes. If you email us, we'll have your name and email contact details.
- Photos and video from workshops & events. We only take images of participants with consent.
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Beat Carnival/ Beat Trading will never sell your personal data to third parties.

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Website Cookies

Cookies are text files containing small amounts of information which are downloaded to your personal computer, mobile or other device when you visit a website. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognises that cookie. Cookies are useful because they allow a website to recognise a user's device, however Beat Carnival does not observe or analyse Cookie activity.

Links To Other Websites

Our website may contain links to other websites (such as YouTube, Facebook, Twitter etc). Please note that this privacy statement applies to our website only. Please be sure to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website.

Summary

We abide by data protection principles, that data must be:

- Processed lawfully, fairly and in a transparent manner
- Collected for specific, explicit and legitimate purposes
- Adequate, relevant and limited to what is necessary
- Accurate and up to date
- Kept for no longer than necessary
- Treated with appropriate security.

CONTACT US

You have a right to request a copy of the personal information that we hold about you and to have any inaccuracies in this data corrected.

Please contact our Operations Manager, Jean Boyd, if you would like to view, amend or delete any personal data we may hold.

Email: jean@beatcarnival.com

Tel: 028 90434767

This policy was updated October 2018 and will be reviewed again in October 2019.