

# Data Protection Policy

English Youth Theatre (EYT)

Last updated	November 2018
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## Definitions

<b>EYT</b>	means English Youth Theatre, part of Umbrella Factory asbl.
<b>GDPR</b>	means the General Data Protection Regulation.

## STATEMENT

EYT will hold the minimum personal information necessary to enable it to perform its functions. All such information is confidential and will be treated with care to comply with the law.

### 1. Data protection principles

EYT 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 are 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, scientific or historical research purposes 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
- 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 EYT.
- b. The Responsible Person shall take responsibility for EYT's ongoing compliance with this policy.

## **3. Lawful, fair and transparent processing**

- a. EYT will ensure its processing of data is lawful, fair and transparent.
- b. Individuals have the right to access their personal data and any such requests made to EYT shall be dealt with in a timely manner.

## **4. Data minimisation**

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

## **5. Accuracy**

- a. EYT shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

## **6. Security**

- a. EYT 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 will be in place to avoid unauthorised sharing of information.
- c. When personal data is deleted this will be done safely such that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions shall be in place.

## **7. 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, EYT shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach.

END OF POLICY