

The Place

Privacy, Data Protection and Information Security Policy

Version 1.0 - April 2018

Policy Statement

In the management of confidential information the Contemporary Dance Trust Ltd (trading as The Place) will operate in a way that fully embraces the principles of privacy, transparency and equality. As a minimum requirement we will ensure the warranted and legal collection and use of information and actively prevent its unauthorised access, misuse or loss. We will also set ourselves a standard which exceeds that stipulated by law and be an exemplar for others to follow. We will communicate this policy and associated procedures in a simple and effective manner to everyone granted access to information systems to ensure awareness.

Scope

This policy covers all information collected and used by The Place, access to which is subject to restriction whether stored on paper or in electronic formats. This is referred to as Confidential Information throughout this policy and for The Place this specifically refers to:

- Personal information – access restricted by the General Data Protection Regulations 2018 (GDPR) and the Privacy and Electronic Communications Regulations (PECR)
- Sensitive data as defined by the GDPR
- Payment card data – access restricted by the Payment Card Industry Data Security Standard (PCI DSS)
- Commercially or legally sensitive information
- Bank details.

It applies to anyone granted access to The Place information systems who thereby has a duty to adhere to this Policy and related procedures.

Principles

- **Access.** We only grant access to confidential information on a need to know basis and for as long as is required. Individuals requiring access will first have to agree to the terms of this Policy. Third party organisations requiring access will have to sign a confidentiality agreement. We actively monitor access and reserve the right to restrict access at any time.
- **Data Collection.** We only collect confidential information and in particular personal information that is deemed necessary to conduct The Place business and that is covered by our data protection notification to the Information Commissioner's Office.
- **Secure Storage, Data Accuracy and Retention.** We store all confidential information securely. We actively manage and maintain the security of this data according to the relevant standards. We ensure that confidential information is kept up to date and ensure secure disposal when it is no longer required.
- **Secure Transfer.** We ensure the security of confidential information when it is in transit beyond the controls of our secure network (e.g. through encrypted removable media).
- **Transparency.** We maintain a Privacy Policy on our website that clearly explains our collection and use of personal information. We ensure our customer service team are able to explain and respond to or escalate public enquiries in relation to the Privacy Policy with clarity and efficiency. We specifically maintain a procedure that makes it possible to

efficiently respond to Subject Access Requests within the timescales defined by the GDPR and we monitor our ability to do so.

- **Who we contact.** We only ever contact people who have asked to be contacted by us or where it is absolutely reasonable or a specific requirement to do so. If we get this wrong we quickly put in place measures to address this error.
- **Procedures.** We maintain a set of detailed procedures that cover all The Place activities that relate to the processing of confidential information.
- **Training and support.** We endeavour to ensure thorough understanding for anyone at The Place who directly handles confidential information through training and support.
- **Governance.** The Finance & General Purposes Committee and Audit Committee are tasked with periodically reviewing this Policy as part of their annual work plan, to ensure its ongoing effective implementation, to identify any changes to business practice that may require policy or procedures to be updated, and to identify any new risks. Management will be responsible for ensuring this policy is complied with. Where considered appropriate, independent audits will also be conducted.
- **Compliance.** We specifically ensure compliance with the General Data Protection Regulations 2018, the Privacy and Electronic Communications Regulations, and the latest version of PCI DSS.
- **Incident Management.** Anyone who has access to The Place Information Systems is required to immediately report a suspected issue in relation to this policy (e.g. security breach) to their line manager, HR or the IT Help Desk.

Related documents

Documents to be read in conjunction with this Policy:

- Privacy Notices (Student, Staff, Public)
- IT and Communications Acceptable Usage Policy
- Mobile Device and BYOD (Bring Your Own Device) Acceptable Usage policy
- Subject Access Request procedure
- Rectification and Erasure process
- Data Breach and Incident reporting policy and procedure
- Student Communications Policy and Guidelines

Related legislation: The Freedom of Information Act

The Act pre-dates the GDPR legislation by some years, and gives the public a general right of access to information held by public authorities. Although not a public authority itself, The Place has responsibilities under the act through our relationships with the Conservatoire for Dance and Drama (CDD) and Arts Council England (ACE). Should a Freedom of Information request to access information held by CDD or ACE concerning The Place be made, we are obliged to agree to that information being made public.

Privacy, Data Protection and Information Security Policy Agreement

I confirm that I have read and understood the Privacy, Data Protection and Information Security Policy (this document).

I understand that I am required to:

- Follow the principles of this policy
- Attend or undertake IT Data Protection & Security training or e-learning within one month of joining
- Identify, read and follow all additional relevant procedures to my role where they currently exist
- Report privacy or security issue to my Line Manager, HR Manager and the IT Help Desk immediately

I understand that contravention of this Policy or any of these procedures may be deemed to be a disciplinary offence.

Employee name	
Signed	
Date	

This policy is not contractual and therefore may be subject to change. However, it does set out how we normally deal with such issues and therefore the content should be regarded as a reasonable management instruction.