

CCF Data Protection Policy

Reviewed by Trustees 21/11/2016

1. Introduction

[Cambridge Carbon Footprint](#) (CCF) needs to collect and use information about individuals whom it comes into contact with - in order to carry on its work.

This personal information must be collected and dealt with appropriately, whether is collected on paper, stored in a computer database, or recorded on other material.

To this end, CCF will adhere to the 1998 Data Protection Act, and specifically, its 8 Principles that:

- 1) personal data will be processed fairly and lawfully
- 2) data will only be collected and used for specified purposes
- 3) data will be adequate, relevant and not excessive
- 4) data will be accurate and up to date
- 5) data will not be held any longer than necessary
- 6) data subject's rights will be respected
- 7) data will be kept safe from unauthorised access, accidental loss or damage
- 8) data will not be transferred to a country outside the European Economic Area, unless that country has equivalent levels of protection for personal data.

2. Data Controller

Cambridge Carbon Footprint is the "Data Controller" under the Act.

It has determined that it will only hold and use personal information for the **purposes** of:

- 1) establishing or maintaining involvement with CCF, or support for it
- 2) providing or administering CCF activities
- 3) recruitment and employment of staff

CCF, as a not-for-profit organisation, is thus exempt from having to notify the [Information Commissioner's Office](#) about data it holds, etc. and from having to register with them.

3. Disclosure

Disclosures of CCF's personal data are restricted to those third parties that are necessary for the purposes in (2), other than those made with the informed consent of the data subject. Individuals will be made aware in most circumstances how and with whom their information will be shared.

4. Data collection

CCF will ensure that personal data is only collected for the purposes in (2) and will observe fully conditions regarding the fair collection and use of information.

When collecting data about individuals, CCF will ensure that they:

- 1) clearly understand why the information is needed
- 2) understand what it will be used for and what the consequences are should they decide not to give consent to processing
- 3) as far as reasonably possible, grant explicit consent, either written or verbal for data to be processed
- 4) are, as far as reasonably practicable, competent enough to give consent and have given so freely without any duress

5. Data Storage

Information and records will be stored securely and will only be accessible to authorised staff and volunteers.

Information will be stored for only as long as it is needed and will be disposed of appropriately: It will not be kept after the relationship between CCF and the data subject ends, unless (and for so long as) it is necessary to do so for the purposes in (2).

It is CCF responsibility to ensure all personal data is non-recoverable from any computer system previously used within the organisation, which has been passed on/sold to a third party.

6. Data access and accuracy

All individuals have the right to access information CCF holds about them.

CCF will, through appropriate management and procedures:

- 1) ensure people, about whom information is held, can:
 - a) access their personal information
 - b) correct, rectify, block or erase any incorrect information about them
- 2) respond to these requests promptly and courteously.

- 3) ensure the quality of information used and take reasonable steps to keep it up to date by asking data subjects whether there have been any changes
- 4) take appropriate technical and organisational security measures to safeguard personal information

7. Operation

CCF will ensure that:

- 1) it has a Data Protection Officer with specific responsibility for ensuring compliance with this Data Protection Policy and related procedures.
- 2) everyone processing personal information understands that they are responsible for following good data protection practice
- 3) everyone processing personal information is appropriately trained to do so and supervised
- 4) it regularly reviews the ways it holds, manages and uses personal information
- 5) all staff are aware that a breach of the rules and procedures identified in this policy may lead to disciplinary action being taken against them

This policy will be updated as necessary to :

- 6) reflect best practice
- 7) ensure compliance with any amendments to the Data Protection Act 1998
- 8) reflect relevant changes in CCF's operations.

In case of any queries or questions in relation to this policy please contact the CCF Data Protection Officer: **Alana Sinclair** alana@comabridgecarbonfootprint.org 01223