



# Data Protection Policy

## 1. Data protection principles

The Charity 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 are accurate, 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 the Charity.
- b. The Trustees shall take responsibility for the Charity’s ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.

## 3. Lawful, fair, and transparent processing

- a. Camp Jojo 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 the charity shall be dealt with in a timely manner.

#### 4. Lawful purposes

- a. All data processed by the charity must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests ([see ICO guidance for more information](#)).
- b. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- c. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the Charity's systems.

#### 5. Data minimisation

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

#### 6. Accuracy

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

#### 7. Archiving / removal

To ensure that data are kept for no longer than is necessary, where data are collected on the basis of consent, we will seek renewal of consent at least every three years.

#### 8. Security

- a. Camp Jojo shall ensure that personal data are 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 should be in place to avoid unauthorised sharing of information.
- c. When personal data are deleted, this should be done safely such that the data are irrecoverable.
- d. Appropriate back-up and disaster recovery solutions shall be in place.

#### 9. Procedures

This policy is to be read in conjunction with our photography and film policy, and with our privacy notice, which can be accessed via the website.

#### 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 Charity shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO ([more information on the ICO website](#)).

Review date

This document was last reviewed on: .....21/11/24, and was approved by the full board of Trustees at the Board meeting on 21/11/24

Next review due on: .....23/11/25.....