

## Data Protection Policy

### Principles

In order to operate effectively and fulfil its legal obligations, InterAct needs to collect, maintain and use certain personal information about current, past and prospective employees, volunteers, clients, supporters, donors, customers, suppliers and other individuals with whom it has dealings. All such personal information, whether held on computer, paper or other media, will be obtained, handled, processed, transported and stored lawfully and correctly, in accordance with the requirements of the General Data Protection Regulation (GDPR).

InterAct is committed to the principles of GDPR and processes data in accordance with the following data protection principles:

- InterAct processes personal data lawfully, fairly and in a transparent manner
- InterAct collects personal data only for specified, explicit and legitimate purposes
- InterAct processes personal data only where it is adequate, relevant and limited to what is necessary for the purposes of processing
- InterAct keeps accurate personal data and takes all reasonable steps to ensure that inaccurate personal data is rectified or deleted without delay
- InterAct keeps personal data only for the period necessary for processing
- InterAct adopts appropriate measures to make sure that personal data is secure, and protected against unauthorised or unlawful processing, and accidental loss, destruction or damage

### Compliance

In order to comply with the data protection principles, InterAct will:

- observe fully all conditions regarding the fair collection and use of personal information
- meet its legal obligations to specify the purpose for which information is used
- collect and process appropriate personal information only to the extent that it is needed to fulfil operational needs or to comply with legal obligations
- ensure the quality of the personal information used
- apply strict checks to determine the length of time personal information is held
- ensure that individuals about whom information is held are able to exercise their rights under the GDPR, including the right to be informed that processing is taking place, the right of access to their own personal information, the right to prevent processing in certain circumstances and the right to correct, rectify, block or erase incorrect information
- take appropriate technical and organisational security measures to safeguard personal information
- ensure that personal information is not transferred outside the EEA without suitable safeguards.

## **Responsibilities**

- It is the responsibility of all employees to ensure that personal information provided to the Company, for example current address, is accurate and up to date. To this end employees are required to inform the Company immediately when changes occur.
- Employees whose role involves the collection, maintenance and processing of personal information about other employees, volunteers, clients, supporters, donors, customers, suppliers or any other individuals with whom the Company has dealings are responsible for following the Company's rules on good data protection practice as notified from time to time by their line manager.

## **Type/classes of information processed**

InterAct processes information to operate effectively and fulfil its legal obligations. This may include:

- personal details
- family detail
- lifestyle and social circumstances
- membership details
- goods and services
- financial details
- education and employment details

This information is used for payroll and administrative purposes, and to realise the Objectives of InterAct.

We also process sensitive classes of information that may include:

- physical or mental health details
- racial or ethnic origin
- religious or other beliefs of a similar nature

This information is used for the purpose of equal opportunities monitoring and health & safety monitoring.

## **Access to information**

Anyone who is the subject of personal information held by the Company has the right to make a subject access request. Individuals who wish to exercise this right should write to the Company at Moulsham Mill, Parkway, Chelmsford, Essex CM2 7PX. If, as the result of a subject access request, any personal information is found to be incorrect it will be amended. The Company will deal promptly with subject access requests and will normally respond within 40 days. If there is a reason for delay, the person making the request will be informed accordingly.

## **IT communications and monitoring**

InterAct provides employees with access to various computer facilities for work and communication purposes. In order to ensure compliance with all applicable laws in relation to data protection,

information security and compliance monitoring, the Company has adopted an Information Security Policy and Principles, which should be read in conjunction with this Data Protection Policy.

**Breach of the policy**

Breach of this policy will be regarded as a disciplinary offence and will be dealt with under the Company's formal discipline procedure.

Employees who consider that there has been a breach of this policy in relation to personal information about them held by the Company should raise the matter via the Company's formal grievance procedure.

*(Please note this policy should not be read in isolation and regard should be given to other InterAct policies that could be relevant. A full list of policies and guidelines is available from your line manager.)*