

### **Data Protection Policy**

This Data Protection Policy is in accordance with the Requirements and the underpinning, good-practice principles of the General Data Protection Regulation 2018. This Data Protection Policy, the Privacy Notice and the Information Audit/Record of Processing Activity comply with the General Data Protection Regulation 2018.

All Officers and members of BAAS must abide by this policy

#### **Maintaining confidentiality and sharing information**

BAAS will keep confidential any information about its members which has been shared with the BAAS Officers. BAAS Officers will not discuss your information with anyone, unless it is to enable BAAS to share information (when requested by you) with members, or for sharing the information provided by other organisations to the members. Information will never be shared with other organisations for marketing purposes. Information will be shared with other organisations such as emergency services, HSE, RIDDOR, HMRC, insurance company for the purpose of meeting BAAS's legal obligations.

#### **Data Protection - the purpose of this policy**

The purpose of this policy is to evidence BAAS's accountability and compliance with the GDPR which replaces and extends individual rights to privacy under the Data Protection Act. In addition to this policy, please see the BAAS Privacy Notice which sets out in a straightforward way, for your information, how 'the data controller' and the 'data processor', process the data you have provided.

#### **Compliance with the GDPR**

BAAS comply with the six principles of the GDPR which say that the data processing must be lawful and transparent; only used for the purpose for which it was originally requested (unless with further consent); limited to what is necessary, accurate and kept up to date; retained or deleted appropriately; and processed with integrity and responsibly to avoid loss or damage.

Under the GDPR you have certain rights to your own information, which is detailed in the Privacy Notice. The Privacy Notice may be viewed on the BAAS website; BAAS will provide you with a paper copy in the event you have no access to the internet. The Privacy Notice explains the 'lawful basis' for holding information about you, your rights as a 'data subject', how the data is collected and used, how long the data is retained and how it is deleted. In accordance with the GDPR, BAAS will not keep information about you any longer than is necessary.

As a data controller and data processor of a not-for-profit organisation, BAAS is not required to be registered with the Information Commissioner's Office, but for good practice will operate to the requirements of the ICO.

#### **Data breach**

BAAS must report any data breach to the ICO if, for example, personal data was lost, destroyed, shared inappropriately, or if someone accessed information without permission. Members and Officers have the right to complain to the ICO. If a data breach occurred BAAS will inform you and address the breach promptly. BAAS will try to contain the data breach and will take steps to establish the severity (the negative affect on you) and tell the ICO, if required. If BAAS decide not to report the breach this would be justified in the recording of the incident in BAAS's Log of Data Breaches, and consideration given as to how we might ensure that the data breach could not occur again. BAAS must investigate a data breach within 72 hours; failure to notify a breach may result in a fine. BAAS can use the ICO Helpline 0303 123 1113 for advice.

#### **Retention of records**

The GDPR requires that personal data is kept only for the purposes for which it was collected and that the data should be retained only for a reasonable period. These retention periods are detailed in the Privacy Notice.

If BAAS is dissolved and no longer exists, the Officers will keep records securely for as long as they are legally required, depending on the reason for retention (see Privacy Notice for retention periods).

### **How you can help BAAS stay compliant**

BAAS, when sending email notifications to the members, will only put email addresses on the "BCC" line of the email address header. This ensures that only individual recipients see their own email address; individual recipients are unable to see the email addresses of other members. BAAS requests that if you wish to email BAAS members as a group you follow this same practice OR you send your email text to one of the Officers, requesting that they forward your email message on your behalf. If you wish to contact an individual BAAS member, please forward your request to one of the Officers who will forward your email message to the member required. Individual members may give their consent to sharing their email addresses with other BAAS members, but until that time, please follow the procedure outlined above.

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