



GDPR POLICY

Starpic Project will follow strict caution to ensure all data is used for the intended purpose given unless it is required to do so by law. All staff receive training to ensure any data is directed to the admin mailbox where the **processor** will use it for the intended purpose.

The **General Data Protection Regulation (GDPR)** is a European Union regulation on information privacy in the European Union and the European Economic Area. The GDPR is an important component of EU privacy law and human rights law, in particular Article 8 of the Charter of Fundamental Rights of the European Union. Starpic Project trustees / directors are the 'Data Controllers' and the

The 8 key principles that exist under the [Data Protection Act 1998](#)

1. Processing should be lawful, fair and transparent

Starpic Project collects data from service user registration forms, staff / volunteer application forms and information collected from surveys and feedback via email.

2. Personal data shall be collected for specified, explicit and legitimate purposes

Data that is collected by Starpic Project will be used for the purposes intended and used to monitor as part of reports and statistics required by funders.

3. Personal data must be adequate, relevant and limited to what is necessary

Starpic Project will only process the personal data needed for the purpose for which it was collected and not share unless required to do so by law.

4. Personal data shall be accurate and kept up to date

Starpic Project will update personal information when informed of any changes and the old information deleted.

5. Personal data shall be kept for no longer than is necessary

Starpic Project will delete personal data when it is no longer needed, alternatively personal data will be anonymised or otherwise modified so that it no longer relates to an individual. Starpic Project will keep information where needed by law such as documentation for **2 years** beyond termination of a person's employment. Contracts will be kept for **6 years** and other documents that are required to be kept by law.

6. There must be appropriate security in place in respect of the personal data

Starpic Project stores information collected on an online drive with access limited to specific users. Limited users have access to view, update and reference contact information for a service user. Emails access is restricted to a specific user with a password to restrict access.



GDPR

UK GDPR defines:

A **controller** as the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data. This is Starpic Project trustees/directors.

A **processor** means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller. This is a Starpic Project administrator, coordinator, worker or volunteer processing data as requested by Starpic Project.

The UK GDPR applies to 'controllers' **and** 'processors'.

- A controller determines the purposes and means of processing personal data.
- A processor is responsible for processing personal data on behalf of a controller
- If you are a processor, the UK GDPR places specific legal obligations on you; for example, you are required to maintain records of personal data and processing activities. You will have legal liability if you are responsible for a breach.
- However, if you are a controller, you are not relieved of your obligations where a processor is involved – the UK GDPR places further obligations on you to ensure your contracts with processors comply with the UK GDPR.
- The UK GDPR applies to processing carried out by organisations operating within the UK. It also applies to organisations outside the UK that offer goods or services to individuals in the UK.
- The UK GDPR does not apply to certain activities including processing covered by the Law Enforcement Directive, processing for national security purposes and processing carried out by individuals purely for personal/household activities.