

# Uppingham First

## DATA POLICIES AND PRACTICES

In the light of the 2018 New Data Protection Regulation the Uppingham First Community Partnership has reviewed its procedures and practices to ensure full compliance. This work was undertaken by the current Data Manager Ron Simpson. Specifically the company has examined each data set it has traditionally stored or processed and determined whether that data could now be deleted or refreshed to ensure it meets the new standard. Directors of the company met on Tuesday May 22<sup>nd</sup> 2018 to review this work and have approved the following policies and practices with immediate effect.

### 1. Appointments

**Data Manager:** Ron Simpson BEM

**Deputy Data Managers:** Mark Shaw and James Torbell (webcam)

### 2. Information Held

The company stores the following data which we require to be able to meet the Partnership's corporate objectives to provide a better service and communicate with visitors and our user groups:-

- Director details (Not shared)
- Volunteer details (Not shared)
- Local Business Contact details (Not shared without authority)
- Company finance and accounting details (shared only with serving directors)
- Annual Accounts (publicly shared)
- Record of Board meetings (publicly shared)
- Internal meetings and correspondence (shared only with directors)
- Data associated with individual projects and community initiatives (shared only with directors)
- Visitor and Key Contact details (Not shared)

**3. Webcam Data** – Reference to Privacy Notice and Data Manager Contact details to be published on webcam site.

**Camera located in well notified police CCTV area with suitable public notices.**

- Live streaming (in public domain)
- CCTV recording - data retained for 14 days (shared only with police and Citizen's making an appropriate data request e.g. victim of alleged crime)

### 4. Individual Rights

Individuals have the right to request details of any data about them held by the company. Such requests should be made to the Data Manager and will normally be responded to within 21 days. Individual rights invested by the New Data Regulation 2018 will be respected where appropriate and lawful. In the event of dispute the matter will be referred to the Uppingham First Board.

### 5. Subject Access Requests

You may request details of any personal information which we hold about you. If you would like a copy of the information held about you please submit your request on the prescribed form which can be obtained from the Data Manager.

## 6. Lawful Basis of the Company's Operations and Data Processing

Uppingham First is a registered UK company created to promote the economic and social sustainability of Uppingham in Rutland. To achieve this objective the company:-

- Hosts a number of private and public meetings
- Undertakes a range of community projects and events
- Retains electronically the data required to undertake and promote such work and stores it for the time frame, and to the standards, required by the statutory authorities
- Hosts and operates an online portal and the Uppingham Webcam to:-
  - i) Stream live, 9am to 6pm, the tourism image and activities of an English market town
  - ii) Promote local businesses and attract external investment to the town
  - iii) Provide a safe community place where public safety standards are heightened by visual monitoring
  - iv) Provide a continuous 24/7 CCTV system of protection storing images for up to 14 days for the purpose of community safety and the prevention and detection of crime
- Operates a local hopper bus service under a section 19 permit
- Operates a local lottery and other fundraising initiatives to support local community groups
- Prepares and publishes a range of research documents and publications in support of the local community

## 7. Consent

Consent in line with requirements of the New Data Regulation will be obtained for all present and future company electronic distribution groups where such groups are required to deliver the objectives of the company. All marketing distribution groups and databases existing prior to May 25<sup>th</sup> have been deleted from the company's records or refreshed in line with the new regulations.

## 8. Data Breaches

The company's systems will be regularly monitored for any personal data breaches. Any significant breach will be investigated and, if appropriate, reported to the OIC. Any such breach will be reported promptly to the Board of Uppingham First and appropriate remedial action taken.

## 9. Privacy Notice Summary

This policy document and privacy notice sets out how the Uppingham First Community Partnership uses and protects any information that you provide to the Partnership. Uppingham First is committed to ensuring that your privacy is protected. Should the Partnership ask you to provide certain information by which you can be identified, you can be assured that it will only be used in accordance with this privacy statement and policy document. The Partnership may update this Notice and its Data Policies from time to time. Updates will be notified on the company website and to those community and business groups registered with the Partnership.

Uppingham First is committed to ensuring that the information it holds is secure. In order to prevent unauthorised access of disclosure, we have put in place suitable physical, electronic and managerial procedure to safeguard and secure the information we collect online.

