



Data Protection Policy

**Market House
14 Market Street
Lerwick**

A charitable company limited by guarantee registered in Scotland No. 165677
Registered Office Market House, 14 Market Street, Lerwick, Shetland ZE1 0JP
Company Secretary Catherine Hughson
Recognised by the Inland Revenue as a Scottish Charity - No. SCO 17286

VOLUNTARY ACTION SHETLAND

DATA PROTECTION POLICY

INTRODUCTION

Voluntary Action Shetland (VAS) needs to gather and use certain information about individuals. These can include customers, organisations, volunteers, employees, business contacts and other people the organisation has a relationship with or may need to contact.

This policy describes how this personal data must be collected, handled and stored to comply with data protection law.

This data protection policy ensures Voluntary Action Shetland:

- Complies with data protection law and follows good practice
- Protects the rights of staff, customers, organisations, volunteers and partners
- Is open about how it stores and processes individuals' data
- Protects itself from the risks of a data breach

This policy applies to Voluntary Action Shetland, all staff and volunteers, management board, all project staff and volunteers.

Everyone who works for or with Voluntary Action Shetland has some responsibility for ensuring data is collected, stored and handled appropriately. Each project that handles personal data must ensure that it is handled and processed in line with this policy and data protection principles.

The data protection officer is:

Catherine Hughson

Executive Officer

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DATA PROTECTION LAW

Data protection law describes how organisations, including Voluntary Action Shetland, must collect, handle and store personal information.

These rules apply regardless of whether data is stored electronically, on paper or on other materials. To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully.

The Data Protection Act is underpinned by important principles which state that personal data must:

- Be processed fairly and lawfully
- Be obtained for specific, lawful purposes
- Be adequate, relevant and not excessive
- Be accurate and kept up to date
- Not be held for any longer than necessary
- Be protected in appropriate ways

Data held by Voluntary Action Shetland is detailed in Appendix A

DATA STORAGE

When data is stored on paper, it is kept in a secure place where unauthorised people cannot see it, including data that is usually stored electronically but has been printed out for some reason. Paper data should be shredded and disposed of securely when no longer required.

- When data is stored electronically, it is protected from unauthorised access, accidental deletion and malicious hacking attempts.
- Data is protected by strong passwords that are changed regularly and never shared between employees.
- When working with personal data, employees ensure the screens of their computers are always locked when left unattended.
- If data is stored on removable media (e.g. Pen drives or CDs) these are kept locked away securely when not being used.
- Data is only stored on designated drives and servers and is uploaded to an approved cloud computing services.
- Servers containing personal data are sited in a secure location, away from general office space.
- Data is backed up regularly.
- Data is never saved directly to laptops or other mobile devices like tablets or smart phones.
- All servers and computers containing data are protected by approved security software and a firewall.

DATA ACCURACY

It is the responsibility of all employees who work with data to take reasonable steps to ensure it is kept as accurate and up to date as possible. Staff should take every opportunity to ensure data is updated and ensure it is updated as inaccuracies are discovered.

SUBJECT ACCESS REQUESTS

All individuals who are the subject of personal data held by Voluntary Action Shetland and VAS Projects are entitled to:

- Ask what information VAS and Projects holds about them and why
- The Data Controller must respond to an access request within 30 days giving details on:
 - What information you hold on someone
 - Where you got the information from
 - Who you share the information with
 - How long it is kept for
 - Legal basis for processing the information
 - Complaints should be sent to the regulator – Information Commissioner's Office

DISCLOSING DATA FOR OTHER REASONS

In certain circumstances, the GDPR allows personal data to be disclosed to law enforcement agencies without the consent of the data subject.

Under these circumstances, Voluntary Action Shetland will disclose requested data. However, the data controller will ensure the request is legitimate, seeking assistance from the board and from their company's legal advisers where necessary.