

1.16 Data Protection Policy

KeyOstas Limited needs to collect and use certain types of information about the Data Subjects who come into contact with it in order to carry on our work. This personal information must be collected and dealt with appropriately, whether on paper, in a computer, or recorded on other material - and there are safeguards to ensure this under the Data Protection Act 2018 encompassing the General Data Protection Regulation (GDPR).

To this end, KeyOstas Limited are registered with the Information Commissioners Office Registration Number Z8484437.

KeyOstas Limited regards the lawful and correct treatment of personal information as very important to successful working, and to maintaining the confidence of those with whom we deal.

KeyOstas Limited intends to ensure that personal information is treated lawfully and correctly.

To this end, KeyOstas Limited will adhere to the Principles of Data Protection, as detailed in the Data Protection Act 2018.

Specifically, the Principles require that personal information:

- Shall be processed fairly, lawfully and with transparency and shall not be processed unless specific conditions are met.
- Shall be obtained only for one or more of the purposes specified in the Act and shall not be processed in any manner incompatible with that purpose or those purposes.
- Shall be adequate, relevant and not excessive in relation to those purpose(s).
- Shall be accurate and, where necessary, kept up to date.
- Shall not be kept for longer than is necessary.
- Shall be processed in accordance with the rights of data subjects under the Act.
- Shall be kept secure by the Data Controller who takes appropriate technical and other measures to prevent unauthorised or unlawful processing or accidental loss or destruction of, or damage to, personal information.
- Shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal information.

KeyOstas Limited will, through appropriate management, strict application of criteria and controls:

- Observe fully conditions regarding the fair collection and use of information.
- Meet its legal obligations to specify the purposes for which information is used.
- Collect and process appropriate information, and only to the extent that it is needed to fulfil its operational needs or to comply with any legal requirements.
- Ensure the quality of information used.
- Ensure that the rights of people about whom information is held, can be fully exercised under the Act. These include:
 - The right to be informed that processing is being undertaken.
 - The right of access to one's personal information.
 - The right to prevent processing in certain circumstances.
 - The right to correct, rectify, block or erase information which is regarded as wrong information).
- Take appropriate technical and organisational security measures to safeguard personal information.

- Ensure that personal information is not transferred abroad without suitable safeguards.
- Treat people justly and fairly whatever their age, religion, disability, gender, sexual orientation or ethnicity when dealing with requests for information.
- Set out clear procedures for responding to requests for information.

Data Storage

Information and records relating to service users will be stored securely and will only be accessible to authorised staff and volunteers.

Information will be stored for only as long as it is needed or required by law and will be disposed of appropriately.

It is KeyOstas' responsibility to ensure all personal and company data is non-recoverable from any computer system previously used within the organisation, which has been passed on/sold to a third party.