



Data protection policy:

St Agnes Chamber of Commerce / www.st-agnes.com

Context and overview

Key details

- Policy prepared by: Annie Lucas - Projects Officer
- Approved by board / management on: [Click here to enter a date.](#)
- Policy became operational on: [Click here to enter a date.](#)
- Next review date: [Click here to enter a date.](#)

Introduction

St Agnes Chamber of Commerce needs to gather and use certain information about individuals in order to communicate with them and improve its services to members and subscribers.

These can include visitors, members, business contacts, employees, newsletter subscribers 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 meet the company's data protection standards — and to comply with the law.

Why this policy exists

This data protection policy ensures **St Agnes Chamber of Commerce**:

- Complies with data protection law and follow good practice
- Protects the rights of staff, members and visitors
- Is open about how it stores and processes individuals' data
- Protects itself from the risks of a data breach

Data protection law

The Data Protection Act 1998 describes how organisations — including **St Agnes Chamber of Commerce**— 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 eight important principles. These say that personal data must:

1. Be processed fairly and lawfully
2. Be obtained only for specific, lawful purposes
3. Be adequate, relevant and not excessive
4. Be accurate and kept up to date
5. Not be held for any longer than necessary
6. Processed in accordance with the rights of data subjects
7. Be protected in appropriate ways
8. Not be transferred outside the European Economic Area (EEA), unless that country or territory also ensures an adequate level of protection

People, risks and responsibilities

Policy scope

This policy applies to:

- All staff, volunteers, and members of **St Agnes Chamber of Commerce**
- All contractors, suppliers and other people working on behalf of **St Agnes Chamber of Commerce**
- Subscribers to the **St Agnes Chamber of Commerce** newsletter

It applies to all data that the company holds relating to identifiable individuals, even if that information technically falls outside of the Data Protection Act 1998. This can include:

- Names of individuals
- Postal addresses - both home and business

- Email addresses
- Telephone numbers

Data protection risks

This policy helps to protect **St Agnes Chamber of Commerce** from some very real data security risks, including:

- **Breaches of confidentiality.** For instance, information being given out inappropriately.
- **Failing to offer choice.** For instance, all individuals should be free to choose how the company uses data relating to them.
- **Reputational damage.** For instance, the company could suffer if hackers successfully gained access to sensitive data.

Responsibilities

Everyone who works for or with **St Agnes Chamber of Commerce** has some responsibility for ensuring data is collected, stored and handled appropriately.

Each team that handles personal data must ensure that it is handled and processed in line with this policy and data protection principles.

However, these people have key areas of responsibility:

- The Executive Committee is ultimately responsible for ensuring that **St Agnes Chamber of Commerce** meets its legal obligations.
- The **Projects Officer, Annie Lucas** , is responsible for:
 - Keeping the board updated about data protection responsibilities, risks and issues.
 - Reviewing all data protection procedures and related policies, in line with an agreed schedule.
 - Arranging data protection training and advice for the people covered by this policy.
 - Handling data protection questions from staff and anyone else covered by this policy.
 - Dealing with requests from individuals to see the data **St Agnes Chamber of Commerce** holds about them (also called 'subject access requests').
 - Checking and approving any contracts or agreements with third parties that may handle the company's sensitive data.
 - Ensuring all systems, services and equipment used for storing data meet acceptable security standards.
 - Performing regular checks and scans to ensure security hardware and software is functioning properly.

- Evaluating any third-party services the company is considering using to store or process data. For instance, cloud computing services.
- Approving any data protection statements attached to communications such as emails and letters.
- Addressing any data protection queries from journalists or media outlets like newspapers.
- Where necessary, working with other staff to ensure marketing initiatives abide by data protection principles.

General staff guidelines

- The only people able to access data covered by this policy should be those who **need it for their work**.
- Data **should not be shared informally**. When access to confidential information is required, employees can request it from their line managers.
- **St Agnes Chamber of Commerce will provide training** to all employees to help them understand their responsibilities when handling data.
- Employees should keep all data secure, by taking sensible precautions and following the guidelines below.
- In particular, **strong passwords must be used** and they should never be shared.
- Personal data **should not be disclosed** to unauthorised people, either within the company or externally.
- Data should be **regularly reviewed and updated** if it is found to be out of date. If no longer required, it should be deleted and disposed of.
- Employees **should request help** from their line manager or the data protection officer if they are unsure about any aspect of data protection.

Data storage

These rules describe how and where data should be safely stored. Questions about storing data safely can be directed to the IT manager or data controller.

When data is **stored on paper**, it should be kept in a secure place where unauthorised people cannot see it.

These guidelines also apply to data that is usually stored electronically but has been printed out for some reason:

- When not required, the paper or files should be kept **in a locked drawer or filing cabinet**.
- Employees should make sure paper and printouts are **not left where unauthorised people could see them**, like on a printer.
- **Data printouts should be shredded** and disposed of securely when no longer required.

When data is **stored electronically**, it must be protected from unauthorised access, accidental deletion and malicious hacking attempts:

- Data should be **protected by strong passwords** that are changed regularly and never shared between employees.
- If data is **stored on removable media** (like a CD or DVD), these should be kept locked away securely when not being used.
- Data should only be stored on **designated drives and servers**, and should only be uploaded to an **approved cloud computing services**.
- Servers containing personal data should be **sited in a secure location**, away from general office space.
- Data should be **backed up frequently**. Those backups should be tested regularly, in line with the company's standard backup procedures.
- All servers and computers containing data should be protected by **approved security software and a firewall**.

Data use

Personal data is of no value to **St Agnes Chamber of Commerce** unless the business can make use of it. However, it is when personal data is accessed and used that it can be at the greatest risk of loss, corruption or theft:

- When working with personal data, employees should ensure **the screens of their computers are always locked** when left unattended.
- Personal data **should not be shared informally**. In particular, it should never be sent by email, as this form of communication is not secure.

- Where possible, data will be **encrypted before being transferred electronically**.
- Personal data should **never be transferred outside of the European Economic Area**.

Data accuracy

The law requires **St Agnes Chamber of Commerce** to take reasonable steps to ensure data is kept accurate and up to date.

The more important it is that the personal data is accurate, the greater the effort **St Agnes Chamber of Commerce** should put into ensuring its 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.

- Data will be held in **as few places as necessary**. Staff should not create any unnecessary additional data sets.
- Staff should **take every opportunity to ensure data is updated**. For instance, by confirming a customer's details when they call.
- **St Agnes Chamber of Commerce** will make it **easy for data subjects to update the information St Agnes Chamber of Commerce** holds about them. This can be done by contacting the Projects Officer on hello@st-agnes.com
- Data should be **updated as inaccuracies are discovered**. For instance, if a customer can no longer be reached on their stored telephone number, it should be removed from the database.
- It is the projects officer's responsibility to ensure **marketing databases are checked against industry suppression files** annually.

Subject access requests

All individuals who are the subject of personal data held by **St Agnes Chamber of Commerce** are entitled to:

- Ask **what information** the company holds about them and why.
- Ask **how to gain access** to it.
- Be informed **how to keep it up to date**.

- Be informed how the company is **meeting its data protection obligations**.

If an individual contacts the company requesting this information, this is called a subject access request.

Subject access requests from individuals should be made by email, addressed to the data controller at hello@st-agnes.com. The data controller can supply a standard request form, although individuals do not have to use this.

Individuals will be charged £10 per subject access request. The data controller will aim to provide the relevant data within 14 days.

The data controller will always verify the identity of anyone making a subject access request, by requesting at least one form of photographic ID before handing over any information.

Disclosing data for other reasons

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

Under these circumstances, **St Agnes Chamber of Commerce** will disclose requested data. However, the data controller will ensure the request is legitimate, seeking assistance from the board and from the company's legal advisers where necessary.

Making a Complaint

If you feel that your data has been used incorrectly and without your permission, you should first make a complaint in writing to our Projects Officer - hello@st-agnes.com

If you feel that your complaint has not been handled correctly by St Agnes Chamber of Commerce you have a right to make a further complaint to the Information Commissioners Office (ICO) <https://ico.org.uk/> who have legal oversight of the GDPR regulations in the UK.

Providing information

St Agnes Chamber of Commerce aims to ensure that individuals are aware that their data is being processed, and that they understand:

- How the data is being used

- How to exercise their rights

To these ends, the company has a privacy statement, setting out how data relating to individuals is used by the company.

[This is available on request. A version of this statement is also available on the company's website.]