IT Schools Africa
Data Protection Policy

IT Schools Africa is committed to a policy of protecting the rights and privacy of all parties involved in our work, including but not limited to individuals, beneficiaries, volunteers, staff and others in accordance with The Data Protection Act 2018 and The General Data Protection Regulation (GDPR).

We also comply with the following regulations:

- The Communications Act 2003
- The Charities Act 2016
- The Privacy and Electronic Communications Regulations (PECR)

This policy applies to all volunteers, staff and beneficiaries within IT Schools Africa. Any breach of The Data Protection Act 2018 is considered to be an offence and in that event, disciplinary procedures apply.

As a matter of good practice, other organisations and individuals working with IT Schools Africa, and who have access to personal information, will be expected to have read and comply with this policy. It is expected that any volunteers or staff who deal with external organisations will take responsibility for ensuring that such organisations sign a contract agreeing to abide by this policy.

GDPR data protection principles

The GDPR outlines six data protection principles that IT Schools Africa fully abides by:

Principle 1:

Lawfulness, fairness and transparency: you must process personal data lawfully, fairly and in a transparent manner in relation to the data subject.

How we will ensure this:

- We will have an accessible and up-to-date privacy policy statement on the website explaining how IT Schools Africa uses personal data and the best person to contact for any questions or assistance.
- We will always put our charity number, registered address and logo on our marketing material.
• We will only contact individuals if they have opted in to communication through our website, through a donation site where they have opted in to further contact, verbally, by email or in writing.
• We will not transfer data to countries outside the EEA without the explicit consent of the individual.

**Principle 2:**

*Purpose limitation:* you must only collect personal data for a specific, explicit and legitimate purpose. You must clearly state what this purpose is, and only collect data for as long as necessary to complete that purpose.

*How we will ensure this:*

• We will not use data for a purpose other than those agreed by data subjects (beneficiaries, supporters, staff and others).
• If the data held by us are requested by external organisations for any reason, this will only be passed if data subjects (beneficiaries, supporters, staff and others) agree.
• External organisations must state the purpose of processing, agree not to copy the data for further use and sign a contract agreeing to abide by IT Schools Africa data protection policies.

**Principle 3:**

*Data minimisation:* you must ensure that personal data you process is adequate, relevant and limited to what is necessary in relation to your processing purpose.

*How we will ensure this:*

• We will monitor the data held for our purposes, ensuring we hold neither too much nor too little data in respect of the individuals about whom the data are held.
• If data given or obtained are excessive for such purpose, they will be immediately deleted or destroyed.

**Principle 4:**

*Accuracy:* you must take every reasonable step to update or remove data that is inaccurate or incomplete. Individuals have the right to request that you erase or rectify erroneous data that relates to them, and you must do so within a month.

*How we will ensure this:*

• We will provide beneficiaries, supporters, staff and others with a copy of their data on request for information and updating where relevant. All amendments will be made immediately and data no longer required will be deleted or destroyed.
• It is the responsibility of individuals and organisations to ensure the data held by us are accurate and up-to-date.
• Completion of an appropriate form (provided by us) will be taken as an indication that the data contained are accurate.
• Individuals should notify us of any changes, to enable records to be updated accordingly.
- It is the responsibility of IT Schools Africa to act upon notification of changes to data, amending them where relevant.

**Principle 5:**

*Storage limitation:* you must delete personal data when you no longer need it. The timescales in most cases aren't set. They will depend on your business' circumstances and the reasons why you collect this data.

*How we will ensure this:*

- We discourage the retention of data for longer than it is required.
- All personal data will be deleted or destroyed by us after three years of no contact, unless it is needed for gift aid or safeguarding purposes.
- If the individual has donated to IT Schools Africa their data will be kept for six years in accordance with HMRC gift aid regulations.

**Principle 6:**

*Integrity and confidentiality:* you must keep personal data safe and protected against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

*How we will ensure this:*

- Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of data.
- We are registered with the Information Commissioner’s Office to keep up-to-date with the most recent data protection guidance and seek guidance should that be needed.
- Password protection is employed on all databases, front and back end, and for access to network servers. Secure cloud storage is used to back up all IT Schools Africa data.