

## **EMDR NE Data Protection Policy**

This Policy meets the requirements of the General Data Protection Regulations May 2018 (GDPR). All Committee Members are accountable and have to comply with this Policy in pursuance of EMDR NE business and have joint responsibility over compliance.

Data Controller / Data Protection Officer: Symon Day

Data processors Committee Members and Co-facilitators

Once a person has given their personal data to EMDR NE having read and agreed to the terms and conditions under which their data is held, that personal data can be used and shared by EMDR NE without further permission being sort, but will not be shared with any other third party without permission.

The Data Controller and Data processors are individually responsible for the management for the personal data they hold in line with this Policy.

Personal data held by EMDR NE

Members names, location, phone number email address and EMDR qualifications, where these have been given.

Contact details of people that EMDR NE engage with in the course of meeting the aims and objectives of EMDR NE i.e. Name, email address, phone number and the company they work for and / or represent, where these details are given.

### **Data protection principles**

Schedule 1 to the Data Protection Act lists the data protection principles in the following terms:

1. Personal data shall be processed fairly and lawfully and, in particular, shall not be processed unless –
  - (a) at least one of the conditions in Schedule 2 is met, and
  - (b) in the case of sensitive personal data, at least one of the conditions in Schedule 3 is also met.
2. Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes.
3. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
4. Personal data shall be accurate and, where necessary, kept up to date.

5. Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

6. Personal data shall be processed in accordance with the rights of data subjects under this Act.

7. Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.

8. Personal data 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 data.

**Note** Schedule 2 refers to individuals giving consent for their data to be processed Schedule 3 refers to personal sensitive data and is not relevant to EMDR NE as no sensitive data is held.

### **1 Processing data fairly and lawfully.**

The personal data of members or people who EMDR NE engage with are not given out to anyone outside of EMDR NE. This data is shared with the Committee Members of EMDR NE

Consent to EMDR NE holding data is given when anyone completes a Membership form. Completing the form means them giving consent to hold and use their personal data in line with the EMDR NE Data Protection Policy.

Consent to EMDR NE holding data on people EMDR NE engage with is noted when they agree to this.

### **2 Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes.**

Member data is collected as a requirement for becoming a member and is used by EMDR NE for matters relating to being a member.

EMDR NE collects data on the people EMDR NE engage with to aid the work the organisation.

### **3 Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.**

EMDR NE collects the minimum data needed to meet the above specified and lawful purposes outlined in item 2

### **4 Personal data shall be accurate and, where necessary, kept up to date.**

Member data is updated annually.

Data on people EMDR NE engage with is updated when the organisation is informed. When EMDR NE stop engaging with a specific person and / or organisation that data is deleted and the records updated with the data of the new relevant person and / or organisation, where that is appropriate.

**5 Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.**

Members are contacted annually to confirm that they still want to be Members and given the opportunity to update their personal data if appropriate. If they have not replied within 8 weeks of being contacted their personal data is destroyed.

Data related to a specific event will be deleted once that event has finished and any necessary admin has been completed.

When EMDR NE stops engaging with a specific person and / or organisation that data is deleted and the records updated with the data of the new relevant person and / or organisation, as is appropriate.

If the person whose data is held by EMDR NE wants their data removed the Data Controller will remove it within 28 working days and inform all data processors so they can update their information.

**6 Personal data shall be processed in accordance with the rights of data subjects under this Act.**

Members and others who EMDR NE Committee Members engage with have the following rights over their data:

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erasure
5. The right to restrict processing
6. The right to data portability
7. The right to object
8. Rights in relation to automated decision making and profiling

Where anyone requests any of the above rights the appropriate EMDR NE Committee Member will respond within 28 working days. EMDR NE does not hold data that needs to be portable and does not use it to make automated decisions or profiling. All requests should be made to the Data Controller, however the most relevant data processor or the controller can action the request.

**7 Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.**

All personal data is held securely on a PC, lap top and / or ipad or similar and is password protected.

Membership data held in Dropbox is only accessible to EMDR NE committee members.

Data Processors are kept informed about what they can legally process and destroy and undergo training where necessary.

This is dealt with in detail in the Security Policy below.

**8 Personal data 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 data.**

Personal data is not shared with anyone outside of EMDR NE.

### **Data Security Policy**

The Data Controller is responsible for the implementation of the Data Security Policy in relation to all personal data held by EMDR NE.

The Data Controller will review the implementation of information security on an annual basis.

The Data Controller records who holds records, what records they hold and how they are stored using the Data Map Flowchart.

### **Access to Data**

Committee members have access to all personal data that is relevant to them.

Access to personal data by anyone else is prohibited.

Data cannot be processed by a third party without permission of the person whose data needs to be processed.

### **Storage and Security of Data**

The Data Controller has a list of all Data Processors and how they store their data.

All personal data is stored securely whether this is on paper or on a computer.

Personal data held on paper will be stored in a locked filing cabinet or similar.

Personal data held on computer is password protected and data held in Dropbox can only be accessed by Committee members who have a link to it. All devices which hold personal data will have malware and firewall protection.

All devices which hold personal data are routinely backed up.

All devices are updated with the latest security patches.

### **Destruction of Personal Data.**

Where personal data is held on paper, this will be destroyed using a cross – shredder. Where data is held on computer or other devices it will be deleted.

Members are contacted annually to confirm that they still want to be members and their personal data is updated as appropriate. If they have not replied within 8 weeks of being contacted their personal data is destroyed.

Data related to a specific event will be deleted once that event has finished and any necessary admin has been completed.

When EMDR NE stop engaging with a specific person and / or organisation that data is deleted and the records updated with the data of the new relevant person and / or organisation, where that is appropriate.

### **Security Breach**

Where a person's data has been compromised they will be informed if they are not aware of it. The breach will be reported to the Data Controller who will report it to the Information Commissioner's office.

### **Privacy Policy**

EMDR NE's Privacy statement is available on the website. EMDR NE provides the following privacy information to our Members on an annual basis, and, when requested, to people with whom EMDR NE engages:

The name and contact details of our organisation

The contact details of our Data Protection Officer/ Data Controller

The lawful basis for the processing

The legitimate interests for the processing

The recipients or categories of recipients of the personal data.

The retention periods for the personal data

The rights available to individuals in respect of the processing

The right to withdraw consent

The right to lodge a complaint with the Data Protection Officer/ Data Controller

EMDR NE regularly reviews and, where necessary, updates its privacy information.

If EMDR NE plans to use personal data for a new purpose, EMDR NE updates its privacy information and communicates the changes to individuals before starting any new processing.