**Data Protection Policy – January 2025**

**Contents**



## 1. Purpose of the Policy

Dave and Ewe is committed to complying with all applicable privacy and data protection laws, including:

- The UK General Data Protection Regulation ("UK GDPR");
- The Data Protection Act 2018;
- The Privacy and Electronic Communications Regulations 2003 (as amended);
- Any relevant successor or related legislation;
- Guidance, codes of practice, and decisions issued by the Information Commissioner's Office ("ICO") or any other UK supervisory authority.

The aim of this policy is to set out how we protect the personal data of individuals and to ensure compliance with the above laws. All staff, contractors, and volunteers

handling personal data on behalf of Dave and Ewe must comply with this policy. Breaches may lead to disciplinary action or other sanctions.

## 2. Scope

This policy applies to:

- All personal data processed by Dave and Ewe, in any format (electronic, paper, audio, visual, or otherwise);
- All staff, volunteers, contractors, and third parties acting on behalf of Dave and Ewe;
- All systems, devices, and storage media used to store or process personal data.

The types of personal data we handle include staff records, customer details, and volunteer information.

The appointed Data Protection Officer (DPO) is Dave Buscombe, reachable at: Dave@daveandewe.co.uk

## 3. Definitions of Data Protection Terms

**Data Subject** – Any living individual whose personal data is processed by Dave and Ewe.

**Personal Data** – Any information relating to an identifiable individual, whether directly or indirectly (e.g. name, ID number, location data, online identifier, physical/physiological, genetic, mental, economic, cultural or social identity).

**Special Category Data** – Sensitive personal data as defined under the UK GDPR, including data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data (where used for identification), health data, and data concerning sex life or sexual orientation.

**Criminal Offence Data** – Data about criminal convictions or offences.

**Data Controller** – The person or organisation determining how and why personal data is processed (Dave and Ewe is the Data Controller).

**Data Processor** – Any person or organisation processing personal data on behalf of a Data Controller.

**Processing** – Any operation performed on personal data, automated or manual, including collection, storage, retrieval, alteration, use, disclosure, erasure, or

destruction.
**ICO** – The UK's independent regulator for data protection and privacy rights.

## 4. Data Protection Principles

Under the UK GDPR, personal data must be:

1. Processed lawfully, fairly, and transparently;
2. Collected for specified, explicit, and legitimate purposes;
3. Adequate, relevant, and limited to what is necessary;
4. Accurate and kept up to date;
5. Kept no longer than necessary;
6. Processed securely to ensure integrity and confidentiality.

## 5. Lawful, Fair and Transparent Processing

We will only process personal data where we have a lawful basis under the UK GDPR, including consent, performance of a contract, legal obligation, protection of vital interests, legitimate interests, or public task.

When collecting personal data directly, we will provide individuals with a clear privacy notice explaining:

- What data is collected and why;
- Who will use and store it;
- The lawful basis for processing;
- How long it will be kept;
- Who it may be shared with;
- Whether it will be transferred internationally;
- How to exercise rights under the UK GDPR;
- DPO contact details.

## 6. Processing Data for the Original Purpose

Personal data will only be used for the purposes stated at collection. If a new purpose arises, we will inform the data subject and obtain consent if required.

## 7. Adequacy, Relevance and Accuracy

Personal data will be accurate, relevant, and limited to what is necessary. We will take reasonable steps to ensure accuracy and correct inaccuracies without delay.

## 8. Retention of Data

Data will be retained only as long as necessary for the purposes for which it was collected, in accordance with our retention schedule. When no longer required, data will be securely deleted or destroyed.

## 9. Rights of Individuals under the UK GDPR

Data subjects have the right to:

- Access their data (subject access request);
- Rectification;
- Erasure ("right to be forgotten");
- Restrict processing;
- Data portability;
- Object to processing;
- Withdraw consent at any time;
- Be informed about automated decision-making and profiling.

## 10. Data Security

We implement appropriate technical and organisational measures to protect data, including:

- Encryption of personal data in transit and at rest;
- Daily system backups stored securely;
- Access controls with unique user logins and passwords;
- Regular security assessments;
- Lockable storage for paper records;

- Secure destruction of confidential waste;
- Staff training in data protection.

Special Category Data will always be encrypted or otherwise protected with enhanced security measures.

## 11. International Data Transfers

We will not transfer personal data outside the UK unless adequate safeguards are in place, such as an ICO-approved adequacy decision, standard contractual clauses, or explicit consent from the data subject.

## 12. Processing Special Category and Criminal Offence Data

Processing such data will require a lawful basis plus an additional UK GDPR condition, typically explicit consent or necessity for employment, legal claims, or public interest.

Financial data, while not classed as special category, will be treated with the same high level of protection.

## 13. Breach Notification

We will report any personal data breach to the ICO without undue delay and, where feasible, within 72 hours, unless it is unlikely to pose a risk to individuals' rights and freedoms. Where a breach is likely to result in high risk, affected individuals will be notified without delay.

## 14. Monitoring and Review of the Policy

This policy will be reviewed annually, or sooner if there are significant changes to legislation or business practices.