

## Data Protection

<b>Policy information</b>	
<b>Organisation</b>	Mo's MOJO
<b>Scope of policy</b>	This policy applies to Mo's MOJO offices and websites in the UK
<b>Policy operational date</b>	This was prepared in May 2018 and will be reviewed in May 2021
<b>Policy prepared by</b>	Mo's MOJO
<b>Policy review date</b>	May 2021

<b>Introduction</b>	
<b>Purpose of policy</b>	<ul style="list-style-type: none"> <li>• complying with the law</li> <li>• following good practice</li> <li>• protecting clients, staff and other individuals</li> <li>• protecting the organisation</li> </ul>
<b>Types of data</b>	<ul style="list-style-type: none"> <li>• Personal names</li> <li>• Email addresses</li> <li>• Home addresses</li> <li>• Telephone numbers</li> <li>• Business details</li> </ul>
<b>Policy statement</b>	<p>We are commit to:</p> <ul style="list-style-type: none"> <li>• comply with both the law and good practice</li> <li>• respect individuals' rights</li> <li>• be open and honest with individuals whose data is held</li> <li>• provide training and support for staff who handle personal data, so that they can act confidently and consistently</li> <li>• Notify the Information Commissioner voluntarily, even if this is not required</li> </ul>
<b>Key risks</b>	<p>This should identify the main risks within your organisation in two key areas:</p> <p>Whilst the risk of data getting into the wrong hands is quite low, we will make sure that your data is not compromised, by using reputable online data storage systems and also ensuring passwords and access is restricted to key personnel.</p>

<b>Responsibilities</b>	
<b>The Board / Company Directors</b>	They have overall responsibility for ensuring that the organisation complies with its legal obligations.
<b>Data Protection Officer</b>	Although not required, we are in the process of appointing a Data protection officer – Their responsibilities would include <ul style="list-style-type: none"> <li>• Reviewing Data Protection and related policies</li> <li>• Advising other staff on tricky Data Protection issues</li> <li>• Ensuring that Data Protection induction and training takes place</li> <li>• Notification to the ICO</li> <li>• Handling subject access requests</li> <li>• Approving unusual or controversial disclosures of personal data</li> </ul>
<b>Employees &amp; Volunteers</b>	We make sure that all staff and volunteers read, understand and accept any policies and procedures that relate to the personal data they may handle in the course of their work.

<b>Data recording and storage</b>	
<b>Accuracy</b>	Data will be checked for accuracy by asking the contact to confirm if the information is correct.
<b>Updating</b>	For our newsletters, we always include an unsubscribe button so your contact information can be updated or deleted by the owner of such details at anytime.
<b>Storage</b>	Storage of the information is mainly online via the cloud
<b>Retention periods</b>	If you are on our mailing list and you do not engage with our material i.e. opening our email. We will delete your account after 6 unopened newsletters
<b>Archiving</b>	As above we do not archive your information, but we will delete after a period of inactivity

<b>Transparency</b>	
<b>Commitment</b>	<p>We are committed to ensuring that Data Subjects are aware that their data is being processed and</p> <ul style="list-style-type: none"> <li>• for what purpose it is being processed</li> <li>• what types of disclosure are likely, and</li> <li>• how to exercise their rights in relation to the data</li> </ul>
<b>Procedure</b>	<p>This will be done by the following:</p> <ul style="list-style-type: none"> <li>• in the welcome letter or pack for members, with occasional reminders in the newsletter</li> <li>• during the initial interview with clients</li> <li>• on the web site</li> </ul>

<b>Lawful Basis</b>	
<b>Underlying principles</b>	We keep your information to communicate with you. We will not sell or share your details with anyone else.
<b>Opting out</b>	We give people the opportunity to opt out of their data being used in particular ways
<b>Withdrawing consent</b>	The organisation may wish to acknowledge that, once given, consent can be withdrawn, but not retrospectively. There may be occasions where the organisation has no choice but to retain data for a certain length of time, even though consent for using it has been withdrawn

<b>Policy review</b>	
<b>Timing</b>	This Policy will be reviewed in full in May 2021

For more information, please visit the ICO website: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/>