

Providing gambling addiction support, education and awareness

RED CARD GAMBLING SUPPORT PROJECT CIC

Data Protection Policy

This Policy applies to all directors, staff and volunteers, and is effective as of 1st March 2021

1. Introduction:

This is the Data Protection Policy for – Red card gambling support project CIC 24 Millbrook Road

Edmonton

London

N9 7hx:

Company no- 09341478

CEO- Mr Tony Kelly

2. Governing legislation

General Data Protection Regulation 2016 (GDPR)

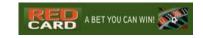
Data Protection Act 2018 (DPA)

3. Key Definitions:

Confidentiality

Confidential information is defined as verbal or written information, which is not meant for public or general knowledge, information that is regarded as personal by users, members, trustees, employees or volunteers.

Consent





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Provision of consent by of the data subject means any freely given, specific, informed, and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

Data

Data are pieces of information relating to a person or a 'Data Subject' that could identify them, that is stored:

- a) Electronically i.e. on computer, including word processing documents, emails, computer records, CCTV images, microfilmed documents, backed up files or databases, faxes and information recorded on telephone logging systems.
- b) Manually i.e. records which are structured, accessible and form part of a filing system where individuals can be identified, and personal data easily accessed without the need to trawl through a file.

Data Controller

The person who (either alone or with others) decides what personal information we will hold and how it will be held or used.

Data Processor

A natural or legal person, public authority, agency, or other body which processes personal data on behalf of the Controller.

Data Subject

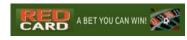
Any living individual whose personal data is being processed, for example, a volunteer.

Information Commissioner's Office (ICO)

The ICO, headed by the Information Commissioner, is responsible for upholding the data privacy of individuals in the UK, supporting best practice in data protection, and managing reports of serious data breaches: www.ico.org.uk.

Processing







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Processing means any use of personal data, including collection, recording, storage, adaptation or alteration, retrieval, consultation, disclosure or otherwise making available, alignment or combination, restriction, erasure or destruction.

Data Protection Officer

The person(s) responsible in our organisation for ensuring that we follow our data protection policy and complies with the General Data Protection Regulation.

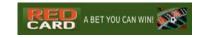
4. Policy Statement:

Red card gambling support project collects and uses the personal information of board members, volunteers, service users and staff, in order to operate a transparent professional business. This Policy applies to the control and processing of all such personal information.

We commit to upholding the seven principles laid out in GDPR, that personal information be:

- processed lawfully, fairly and in a transparent manner in relation to the data subject ('lawfulness, fairness and transparency'):
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall, in accordance with Article 89(1), not be considered to be incompatible with the initial purposes ('purpose limitation');
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation');
- accurate and, where necessary, kept up to date; every reasonable step must be taken to
 ensure that personal data that are inaccurate, having regard to the purposes for which they
 are processed, are erased or rectified without delay ('accuracy');
- kept in a form which permits identification of data subjects for no longer than is necessary for
 the purposes for which the personal data are processed; personal data may be stored for
 longer periods insofar as the personal data will be processed solely for archiving purposes in
 the public interest, scientific or historical research purposes or statistical purposes in
 accordance with Article 89(1) subject to implementation of the appropriate technical and
 organizational measures required by this Regulation in order to safeguard the rights and
 freedoms of the data subject ('storage limitation');
- processed in a manner that ensures appropriate security of the personal data, including
 protection against unauthorized or unlawful processing and against accidental loss,
 destruction, or damage, using appropriate technical or organizational measures ('integrity and
 confidentiality').

In addition, we will:





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- comply with the DPA, GDPR and Information Commissioner's Office (ICO) guidance in respect of the data we hold about individuals, respecting data subjects' rights
- be open and honest with potential data subjects about how their personal information is or will be being held
- foster a culture in which those involved in our organization take data protection practices seriously and treat data subjects' personal information with care and respect
- ensure those involved in our organization receive any training and supervision necessary to their roles
- review and revise our data protection processes, and this Policy as necessary.

5. Responsibilities & Contact Details

Overall and final responsibility for data protection rests with the **Chief Executive**, who is currently:

Mr. Tony Kelly

Tomnycov1@hotmail.com

07444 512184

Day-to-day responsibility for data protection, and for queries relating to this Policy, rests with the Data Protection Officer, who is currently:

Mr. Tony Kelly

Tonycov1@hotmail.com

07444 512184

6. Consent

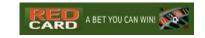
In accordance with this Policy, we will ensure that consent is obtained at all times, for the purposes of processing data subjects' personal information. We will also make clear to our data subjects what the purposes of collecting their data are.

7. Access to Data

Should a data subject request access to the information stored about them; should they wish for their information to be erased; or to make any other requests under GDPR, the Data Protection Officer shall ensure the request is handled without delay, and in any case within one calendar month of receiving the request.

8. Data Security

We will ensure that the personal information we process is:





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- protected by the use of passwords if kept on computers and/or other devices.
- stored in secure rooms, using locked drawers or cabinets, or if electronically, secure digital storage.
- treated confidentially, ensuring consent is further obtained from the data subject if the organization wishes to process their personal information in a new or different way, unless the processing is required by law.
- destroy confidentially if it is no longer needed, or if an individual requests, e.g. by shredding.

9. Data Breaches & Reporting

All staff, trustees and volunteers are required to report any data breach to the Data Protection Officer as soon as possible. A data breach means a breach of data security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, data processed by the organization.

The Data Controller is responsible for recording and reporting any data breaches that occur across the organization.

Less serious breaches will be recorded in an appropriate place, ensuring changes are made to this Policy and to every-day processes where necessary.

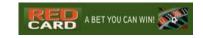
Serious personal data breaches will be reported by the Data Protection Officer to the Board/Trustees/Management Committee at the earliest possible opportunity, as well as being reported to the ICO within 72 hours of the breach occurring if possible, and if not, informing the ICO the reasons for any delay.

10. Review

A review of this Policy will take place on or before 1st March 2022

11.

NAME: Mr.Tony Kelly





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SIGNED: T.kelly

POSITION IN ORGANISATION: Founder/CEO

DATED: 1st March 2021



