

## DATA PROTECTION POLICY

(April 2018)

The Data Protection Act (1998) establishes a framework of rights and duties which are designed to safeguard personal data. The Act applies to living individuals only, not organisations, hence personal data. The Act also applies to an activity – processing personal data – rather than to particular people or organisations. Thus, anyone who processes personal data must comply with the Act and must handle that data in accordance with the principles set out in the Act.

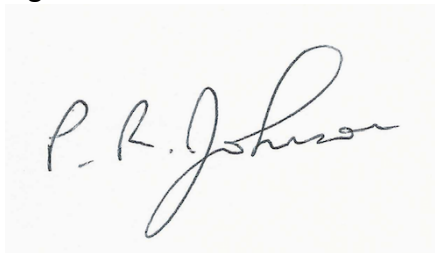
TransWilts Community Interest Company (TWCIC) is a company, run by voluntary and part time personnel, which promotes the use of rail transport in Wiltshire and connecting Wiltshire communities by public transport. TWCIC recognises its responsibilities under the Data Protection Act and will achieve these as follows:

1. Data will only be collected on behalf of TWCIC by specified personnel. Data will be collected by consent where appropriate, or by other criteria as specified in Article 6 of the General Data Protection Regulation.
2. Only such data will be collected as is necessary for the efficient administration of TWCIC. All reasonable efforts will be made to ensure that the data held is accurate. An individual can obtain, without charge, details of any data held by TWCIC about that person by written application to the Secretary. Any data which is deemed by an individual to be incorrect will be amended or deleted as requested.
3. Data will be held for such length of time as is deemed necessary for the efficient administration of TWCIC, or as may be required by law. This period will be reviewed periodically by the Board, but at present these are:  
Data concerning Members, Friends, volunteers, Rail User Groups - ongoing, so long as the individual is associated with TWCIC  
Financial data - as required by legislation ( 3 years)
4. All reasonable steps will be taken to ensure the security of any data held on behalf of TWCIC, whether in written or electronic form. Laptops and home PCs will be password protected, written copies will be stored in a secure environment.
5. All reasonable steps will be taken to ensure that data is disposed of in a secure manner, to be determined by the Board.
6. TWCIC will not pass collected data to any third party unless required to do so for legal reasons.

7. Transfer of data outside the European Economic Area (EEA): TWCIC will strive to use service providers with servers inside the UK or the EEA. Otherwise, it will only use service providers that show compliance with EEA security protocols.
8. Possible data breaches should be reported as soon as possible and will be thoroughly investigated and, where necessary, reported to the Information Commissioner's Office ([ico.gov.uk](http://ico.gov.uk)).
9. Any complaints regarding the collection and use of personal data should be made to the Secretary in the first instance, or ultimately to the [ico.gov.uk](http://ico.gov.uk) as above.

This policy statement and accompanying Data Protocols will be reviewed (and where necessary) updated from time to time, but at least bi-annually.

Signed:

A handwritten signature in black ink on a light-colored background. The signature is written in a cursive style and reads "P. R. Johnson".

Name: Paul Johnson

Title: Chairman

Date: 24 April 2018

On behalf of the Board

TransWilts CIC  
DATA PROTECTION POLICY

DATA PROTOCOLS

These protocols are intended to assist individual persons working on behalf of TransWilts Community Interest Company (TWCIC) in complying with the requirements of the Data Protection Act (1998) and the General Data Protection Regulation (2018) and should be read in conjunction with the TWCIC Data Protection Policy.

1. Those personnel who will collect data on behalf of TWCIC are:
  - a) Secretary/Administrator
  - b) CRP Officer
  - c) Membership & Friends Secretary
  - d) Rail User Group Secretary if affiliated to TWCIC
  - e) Treasurer
  
2. No data shall be requested that is not absolutely necessary to the processing of entries or general administration of TWCIC.
  
3. Data shall be kept for the following periods:

|                                |  |
|--------------------------------|--|
| Rail User Groups , Membership, | Ongoing – to be kept up to date as far as possible |
| Treasurer                      | As required by legislation (generally 3 years)     |
  
4. Secure storage of data –
  - Laptops should be password protected
  - On home PCs relevant files should be password protected
  - Written copies should be stored in a secure place out of plain sight
  - On-line membership entries will be administrator-protected

Data should not be copied, except for reasons of operation, and when finished with should be deleted from PCs, or paper copies destroyed.

The registered company address should be used for formal and written correspondence to the TWCIC.

5. Disposal of data –  
Written copies should be shredded  
Electronic records should be deleted from the laptop/PC, including archived copies and this should be confirmed in writing by the Secretary.

In the event that one of the above personnel in section1 leaves TWCIC, all data collected on behalf of the CIC must be returned to the Secretary or Chairman and electronic data deleted from any personal computers/laptops. Written confirmation that all data has been returned or deleted should be given within one month.

Passwords must be changed if anyone leaving was an administrator of the TWCIC database.

6. Data collected on behalf of TWCIC must not be passed to third parties without the consent of the individual involved. This will not apply when statutory law is involved, eg police or tax investigation.
7. Any service providers to whom data may be passed for processing – for example bulk mailing – must be approved by the Board.