



## The Nayamba Trust Privacy Policy

### Introduction

This privacy policy explains when and why we collect personal information; how we use it, keep it secure and when in what circumstances we may share it with other organisation's.

### The Purpose of this Policy

This Privacy Policy ensures that The Nayamba Trust:

- Complies with data protection law and good practice
- Protects the rights of all persons with whom it has dealings
- Is open about how it stores and processes all data
- Protects itself from the risks of a data breach

### Data Protection Law

The General Data Protection Regulation (GDPR) describes how organisations must collect, handle and store personal information, and whether stored electronically, on paper, or by other means. To comply with the law, personal information must be collected and used fairly, stored safely, and must not be disclosed unlawfully.

The GDPR is underpinned by eight important principles, requiring that personal data must:

- Be processed fairly and lawfully
- Be obtained only for specific, lawful purposes
- Be adequate, relevant and not excessive
- Be accurate and kept up to date
- Not be held for any longer than necessary
- Be processed in accord with the rights of data subjects
- Be protected in appropriate ways
- Not be transferred outside of the European Economic Area, unless that territory also ensures an adequate level of protection

### Your rights under Data Protection

From the 25th May 2018, your rights under Data Protection legislation are as follows:

- **The right of access** to your own data and confirmation of how it is processed
- **The right to rectification** of any of your personal data if it is inaccurate or incomplete.
- **The right to erase.** You can withdraw consent for us to hold your sensitive data at any time, but most personal data is held under a legal obligation and will be retained for the period as defined by the regulation. However, each case will be considered on its own merits and where information cannot be erased this will be explained to the data subject. Once information has been deleted it cannot be recovered.
- **The right to restrict processing.** When you request that processing is restricted it will be excluded until such time it has been confirmed that the data has been corrected or that it is being processed in the way that complies with the legal purpose.
- **The right to data portability.** You have the right to your personal data in a format that is machine readable.
- **The right to object.** You have the right to object to how we process your information.
- **Rights in relation to automated decision making and profiling.** The Nayamba Trust does not use profiling or automated decision making.

### Policy Scope

The policy applies to The Nayamba Trust. It applies to all data held relating to identifiable individuals, including:

- Names of individuals, postal addresses, email addresses and telephone numbers
- Any other information whatsoever relating to individuals

### **Data Protection Risks**

This policy helps to protect The Nayamba Trust from data security risks including: any breaches of confidentiality, failure to offer choice, if appropriate, and reputational damage.

### **Responsibilities**

The Trustees of The Nayamba Trust, and any persons volunteering have responsibility, for ensuring that data is collected, stored and handled appropriately, and in line with this policy. The Trustees acknowledge the following key areas of responsibility:

- To review all data protection procedures and related policies
- To undertake any appropriate data protection training
- To deal with all data protection questions arising
- To deal with requests from individuals to see data held regarding them
- To ensure all electronic systems and services used for processing or storing data meet acceptable security standards on an ongoing basis.
- To approve any data protection statements whatsoever that may be issued

### **Guidelines**

The following guidelines apply:

- The only persons able to access data will be those requiring it to progress or review work.
- No data will be shared, other than to persons duly authorised, and in accord with Privacy Notices issued. There will be no disclosure to unauthorised persons.
- All data will be kept secure as further stated herein.
- Data will be regularly reviewed and updated as needed. If no longer required, it shall be deleted and disposed of.

### **Data Storage**

TNT follow the following procedures:

- We use a Mailing list Provider (YMLP) which is GDPR compliant and requires a password to log in
- When data is stored on paper including printed information from electronic systems, it will be kept securely and away from unauthorised persons
- All those who will have access to TNT data will also have a GDPR compliant Microsoft email address that is password protected
- Data will be disposed of securely when not required
- When data is stored electronically, it will be protected from unauthorised access, and from accidental deletion, and hacking attempts; and by secure passwords and will only be stored, otherwise on designated drives or servers and in a secure location
- Data will be backed up as required and all electronic equipment and data is protected by approved security software

### **Data Use and Accuracy**

These rules provide that:

- When working with personal data any Computers will be locked when not attended, and unable to access without passwords known only to the Computer users
- Personal data will not be shared other than as authorised
- Data will not be transferred out of the European Economic Area
- Data will be held in as few places as necessary
- Data will be updated if inaccuracies are discovered

### **Subject Access Requests**

All individuals who are the subject of personal data are entitled to:

- Ask what information is held about them and why
- Ask how to gain access to it
- Be informed how to keep it up to date
- Be informed how The Nayamba Trust is meeting General Data Protection obligations

- Where an individual makes contact to request the above information such request will be granted once the identity of the person so requesting has been suitably verified

**Disclosing Data for other Reasons**

In certain circumstances the Legislation allows personal data to be disclosed to Law Enforcement Agencies without consent of the data subject, and will disclose requested data in such instances, but only when the legitimacy of the request has been established.

**Providing Information**

The Nayamba Trust aims to ensure that individuals are aware that their data is being processed suitably, and that they understand how the data is being used, and how to exercise their rights. To these ends, Privacy Statements are made available, setting out how the data is dealt with.

**Marketing**

The Nayamba Trust does not undertake unsolicited marketing and will not sell, rent or otherwise share your information to 3<sup>rd</sup> parties for marketing purposes.

With your consent we do send out information about our upcoming events and our quarterly newsletters.

Should you no longer wish to receive this information simply let us know, by emailing [admin@nayambaschool.org](mailto:admin@nayambaschool.org)