

Autus, The Hao2eu Foundation Data Protection Policy

1. Background

The Data Protection Act covers information about individuals which is held on computer or in a manual filing system, or which is recorded with the intention that it will be part of such systems. The Act applies to people or organisations that use or hold such personal data.

The Act is based on the right of the individual (the Data Subject) to know what information is being held about them, and how the information will be used. The Act sets out principles to ensure that personal data is:

- processed fairly and lawfully
- obtained only for specified purposes
- relevant to the purposes for which it is processed
- accurate and kept up to date
- not kept for longer than is necessary
- processed according to the rights of the Data Subject under the Act
- protected against unauthorised processing, accidental loss or damage
- not transferred to areas outside of the European Union (including via websites)

Autus holds personal information on employees, freelancers, learners and volunteers.

Autus seeks to comply with both the letter and the spirit of the Act. The organisation will ensure that all personal information is collected and used fairly, stored safely and not disclosed to any other person unlawfully. Autus staff must abide by this policy.

2. Policy

- i. Personal records will be kept at the Surbiton Office and on the organisation's cloud infrastructure in accordance with its procedures
- ii. Autus staff, other than designated persons (specifically CEO, HR rep from Trustee Board and HR admin support) in the course of their duty, do not have access to information on other staff, volunteers, freelancers and / or learners.
- iii. We will take reasonable steps to keep personal data up to date and accurate.
- iv. Personal data will be stored for 6 years after an employee, volunteer or work placement has worked for the organisation. Unless the organisation is specifically asked by an individual to destroy their details it will normally keep them on file for future reference. The CEO has overall responsibility for destroying personnel files.
- v. Where learners or work placements are beneficiaries of funding their personal data will be stored for the amount of time required by the funding body always in accordance with this policy.
- vi. Where learners are beneficiaries of funding it may be necessary for Autus to share the following types of data linked directly to a named learner with the funding body:
 - Course Attendance Information

- Performance, achievements and qualifications
- Programme feedback
- Information relevant to the effective delivery of the programme

We will advise you of the information that we are required to share and ensure only necessary information for course administration and / or funding compliance is shared.

- vii. Personal data is kept in paper-based systems and on a password-protected computer system.
- viii. Every effort is made to ensure that paper-based data are stored in organised and secure systems. All personal information held in a paperbased format is securely locked at the Surbiton office. Only the CEO and the HR representative from the Trustee Board has the key to the filing cabinet.
- ix. Information about individuals will not be disclosed to any third party outside of the company without the permission of the individual.
- x. Personal data will not be kept for longer than is required.
- xi. Where photographs of staff or service users are used to publicise or promote the organisation, permission will be sought from individuals using our photo / video release forms and the photograph used for the specified purpose.
- xii. Individuals have the right to see the information held on them by the company. Requests should be in writing to CEO who will provide a copy of the information within two weeks of receiving the request. No charge is made.

Related policies:

IT Security Policy