

## Data Protection Policy for VOCAWAVES

VOCAWAVES is committed to processing data in accordance with its responsibilities under the GDPR, as well as its beliefs on privacy and data protection.

This document outlines VOCAWAVES' commitment to privacy and data protection. This policy applies to all personal data processed by VOCAWAVES. The committee shall take responsibility for VOCAWAVES' compliance with this policy.

These guidelines are based on Article 5 of the GDPR, requiring that personal data shall be:

- a. Processed lawfully, fairly, and in a transparent manner in relation to individuals;
- b. 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 not be considered to be incompatible with the initial purposes;
- c. Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. 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;
- e. 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 subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- f. Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures."

VOCAWAVES will:

- Ensure its processing of data is lawful, fair, and transparent with a centralised storage of data
- Review the storage in the Annual General Meeting
- Give individuals the right to access their personal data and any requests shall be dealt with in good time

- Process data only on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task, or legitimate interests
- Note the appropriate lawful basis in the storage, and where consent is required evidence of the opt-in consent shall be kept with it
- Give individuals the option to revoke their consent when communications are sent to them
- Ensure personal data is adequate, relevant, and limited to what is necessary in relation to the purposes of which it is processed
- Take reasonable steps to ensure personal data is accurate. When necessary, via the lawful base, steps will be made to keep the data up to date
- Put an archiving policy in place for the storage for each lawful base in which personal data is processed and review this in the Annual General Meeting
- Ensure personal data is stored securely using modern software that is kept up to date
- Limit access to personal data to the committee and volunteer/staff personnel who need access and appropriate security to be put in place to avoid unauthorised sharing of the information
- Put back-up and disaster recovery solutions in place.

### **Privacy Policies**

Where data is shared with external parties, clear mentioning in either a digital Privacy Policy or physical consent form will be made. This will be provided along with a valid reason based on the lawful base, with information regarding the party's privacy guidelines and GDPR processes, as well as how to opt-out.

### **Breach**

In the event of a breach of security leading to the accidental or unlawful destruction loss, alteration, unauthorised disclosure of, or access to, personal data, VOCAWAVES shall promptly assess the risk to people's rights and freedoms.

### **Review**

This Policy and these Procedures will be regularly reviewed:

- In accordance with changes in legislation and guidance on privacy and data protection or following any changes within VOCAWAVES.

- Following any issues or concerns raised about the privacy policies within VOCAWAVES
- In all other circumstances, at least every Annual General Meeting (AGM).

**Document updated and effective as of 14/09/2023**