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| Youth Cymru Logo JPEG | **Data Protection Policy** |

### 1. Introduction

1.1 The General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) is a [regulation](https://en.wikipedia.org/wiki/Regulation_%28European_Union%29) by which the [European Parliament](https://en.wikipedia.org/wiki/European_Parliament), the [European Council](https://en.wikipedia.org/wiki/European_Council) and the [European Commission](https://en.wikipedia.org/wiki/European_Commission) intend to strengthen and unify data protection for individuals within the [European Union](https://en.wikipedia.org/wiki/European_Union) (EU). It also addresses the export of personal data outside the EU. The primary objectives of the GDPR are to give citizens back control of their personal data and to simplify the regulatory environment for international business by unifying the regulation within the EU. The GDPR replaces the [data protection directive (officially Directive 95/46/EC)](https://en.wikipedia.org/wiki/Directive_95/46/EC) from 1995. The regulation was adopted on 27 April 2016 and applied from 25 May 2018 after a two-year transition period

1.2 The 1998 Data Protection Act, which came into force on 1 March 2000, continued to apply until the new General Data Protection Regulations came into force in May 2018.

1.3 The following guidance is not a definitive statement on the Regulations, but seeks to interpret relevant points where they affect Youth Cymru.

1.4 The Regulations cover both written and computerised information and the individual’s right to see such records.

1.5 It is important to note that the Regulations also cover records relating to staff and volunteers.

1.6 All Youth Cymru staff are required to follow this Data Protection Policy at all times.

1.7 The Chief Executive has overall responsibility for data protection within Youth Cymru but each individual processing data is acting on the controller’s behalf and therefore has a legal obligation to adhere to the Regulations.

### 2. Data protection principles

2.1 Youth Cymru is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

1. processed lawfully, fairly and in a transparent manner in relation to individuals;
2. 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;
3. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
4. 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;
5. 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
6. 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.”

### 3. General provisions

3.1 This policy applies to all personal data processed by the Charity.

3.2 The CEO shall take responsibility for the Charity’s ongoing compliance with this policy.

3.3 This policy shall be reviewed at least annually.

3.4 Youth Cymru shall register with the Information Commissioner’s Office as an organisation that processes personal data.

### 4. Lawful, fair and transparent processing

4.1 Youth Cymru will ensure its processing of data is lawful, fair and transparent, the Charity shall maintain a Register of Systems.

4.2 The Register of Systems shall be reviewed at least annually.

4.3. Individuals have the right to access their personal data and any such requests made to the charity shall be dealt with in a timely manner.

### 5. Lawful purposes

5.1 All data processed by the Youth Cymru must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests.

5.2 The Charity shall note the appropriate lawful basis in the Register of Systems.

5.3 Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.

5.4 Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the Charity’s systems.

### 6. Data minimisation

6.1 The Charity shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

### 7. Accuracy

7.1 The Charity shall take reasonable steps to ensure personal data is accurate.

7.2 Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

### 8. Archiving / removal

8.1 To ensure that personal data is kept for no longer than necessary, the Charity shall put in place an archiving policy for each area in which personal data is processed and review this process annually.

8.2 The archiving policy shall consider what data should/must be retained, for how long, and why.

### 9. Security

9.1 The Charity shall ensure that personal data is stored securely using modern software that is kept-up-to-date.

9.2 Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.

9.3 When personal data is deleted this should be done safely such that the data is irrecoverable.

9.4Appropriate back-up and disaster recovery solutions shall be in place.

### 10. Breach

10.1 n the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, Youth Cymru shall promptly assess the risk to people’s rights and freedoms and if appropriate report this breach to the ICO.

**Signed:** .. ...............................................................

**Position:** ...Acting Joint CEO...........................................................

**Latest review/approved dated:** .........7th April 2018.......................