



10 days Data Protection Policy

Data Projection Policy

10 days recognises that privacy is important. **10 days** has complied with the Information Commissioner's Office under the Data Protection Act 1998 and is committed to respecting privacy of its friends and contacts. **10 days** will apply appropriate protection and management of any personally identifiable information shared with us. The level of protection will be based on an assessment of the harm that is likely to be caused by the loss or unauthorised disclosure of the personal information given to us. The information provided will be processed by **10 days** in accordance with the Data Protection Act 1998.

In some instances, the name of a Friend, title of a work and/or images of an artwork provided by a Friend of **10 days**, may be used on the **10 days** website, in promotional material and press coverage of the event, to enable us to tailor our communications and marketing, to ensure that those interested hear about **10 days** activities.

We have an obligation under the Data Protection Act to ensure that all information held and processed about individuals, complies with the principles of the Act.

In particular, **10 days** undertakes, in accordance with the eight data protection principles outlined in the Act, that personal information will:

- Be processed fairly and lawfully,
- Be obtained for one or more specified lawful purposes and shall not be further processed in any manner incompatible with that purpose or those purposes,
- Be adequate, relevant and not excessive in relation to the purpose, or purposes, for which they are processed,
- Be accurate and, where necessary and possible, kept up-to-date,
- Not be kept for longer than is necessary,
- Be processed in accordance with the rights of the data subjects. This would mean that individuals have a right of access to the information that **10 days** holds about them,
- Be protected by appropriate technical and organisational measures against unauthorised or unlawful processing and against accidental loss or damage,
- Not be transferred to a Country or territory outside the European Economic Area unless there is a clear legal basis in the Data Protection Act for making the transfer.

10 days will not sell, trade or rent your personal details to others.

Personal information will not be disclosed to any other party, except in the following instances permitted by law:

- Where we are legally compelled to do so,
- Where there is a duty to the public to disclose,
- Where disclosure is required to protect our interest,
- Where disclosure is made at the individual's request or with the individual's consent.

Certain information collected may be classified as sensitive and **10 days** can only use such data where we have your explicit consent. This data relates to racial or ethnic origin, political opinions, religious beliefs, physical or mental health, criminal proceedings and offences. Under the terms of the Act, individuals have the right to obtain a copy of the information we hold about them.

In all cases, "Friends" may opt to withdraw their data upon written request and such data will be removed immediately. Additionally, those contacts receiving emails may unsubscribe upon written request and their contact details will be removed from the database immediately. In both cases, notification to unsubscribe must be made to:

The process for ensuring **10 days** maintains effective deployment of its Data Protection Policy lies with the Board of Directors and will be reviewed biennially by the **10 days** Steering Group, or more frequently, as appropriate.

In all matters regarding Data Protection complaints, in the first instance, write to:

The Administrator - **10 days**
First Floor
45 Southgate Street
Winchester
Hants SO23 9EH

or contact@10dayswinchester.org marked "Data Protection".

Any such complaints will be fully investigated as speedily as possible using the **10 days** Complaints Procedure, and you will be kept advised of action taken. Please refer to the **10 days** Complaints Procedure detailed in the **10 days** Complaints Policy for full information.

The **10 days** Complaints Procedure is the overall responsibility of the **10 days** Board of Directors. Procedure for ensuring **10 days** upholds its Complaints Procedure lies with the **10 days** Steering Group. The process of handling complaints will be reviewed biennially, or more frequently, as appropriate.

This privacy policy is not intended to, and does not create, contractual or other legal rights.

(Adopted on 25/04/2013)