

DATA PROTECTION POLICY

Purpose

Wise Origin needs to collect and use certain types of information about the Data Subjects. This personal information must be collected and dealt with appropriately. This applies to all storage mediums e.g. paper, computer hard drive, the cloud etc. The General Data Protection Regulation (GDPR) serves to protect the data and the data subjects.

Definitions

Data Controller – The person who (either alone or with others) decides what personal information Wise Origin will hold and how it will be held or used.

GDPR – The update to the DPA which enforces tighter controls surrounding data and the data subject.

Data Protection Officer – The person(s) responsible for ensuring that it follows its data protection policy and complies with the Data Protection Act 2018 is Yusuf Patel.

Data Subject/Service User – The individual whose personal information is being held or processed by Wise Origin (for example: a client, an employee, a supporter).

'Explicit' consent – is a freely given, specific and informed agreement by a Data Subject (see definition) to the processing of personal information about him/her. Explicit consent is needed for processing sensitive data.

Notification – Notifying the Information Commissioner about a security breach in loss, release or corruption of personal data. This must be first brought to the attention of a manager/senior manager and the IT Manager, it is the responsibility of the Data Protection Officer to notify the Information Commissioners office.

Information Commissioner – The UK Information Commissioner responsible for implementing and overseeing the Data Protection Act 1998 and GDPR.

Processing – means collecting, amending, handling, storing or disclosing personal information

Personal Information – Information about living individuals that enables them to be identified – e.g. name and address. It does not apply to information about companies and agencies but applies to named persons or employees within Wise Origin.

Sensitive data – includes the following information:

- Racial or ethnic origin
- Political opinions
- Religious or similar beliefs
- Trade Union Membership
- Physical or mental health
- Sexual life
- Criminal record
- Criminal proceedings relating to a Data Subject's offences

Data Controller

Wise Origin Directors are the Data Controllers under the Act, which means that the Data Controller determines what purpose personal information will be used for. The Data Controller is also responsible for notifying the Information Commissioner of the data it holds or is likely to hold, and the purpose that this data will be used for.

Disclosure

Wise Origin may share data with other agencies such as the local authority, funding bodies and other voluntary agencies.

The Data Subject will be made aware, in most circumstances how and with whom their information will be shared. There are circumstances where the law allows Wise Origin to disclose data (including sensitive data) without the data subject's consent. These are:

- Carrying out a legal duty in line with relevant legislation
- Protecting vital interests of a Data Subject or other person
- The Data Subject has already made the information public
- Conducting any legal proceedings, obtaining legal advice or defending any legal rights
- Monitoring for equal opportunities purposes – i.e. race, disability or religion
- Providing a confidential service where the Data Subject's consent cannot be obtained or where it is reasonable to proceed without consent: e.g. where we would wish to avoid forcing stressed or ill Data Subjects to provide consent signatures.

Wise Origin regards the lawful and correct treatment of personal information as imperative to successful working, and to maintaining the confidence of those with whom we deal with. Wise Origin intends to ensure that personal information is treated lawfully and correctly.

Wise Origin and its employees will adhere to the Principles of Data Protection, as detailed in the GDPR.

Specifically, the Principles require that personal information:

- processed lawfully, fairly and in a transparent manner in relation to individuals;
- 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;
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- 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;
- 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

- 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.

Wise Origin will, through appropriate management, strict application of criteria and controls:

- Observe fully conditions regarding the fair collection and use of information
- Meet its legal obligations to specify the purposes for which information is used
- Collect and process appropriate information, and only to the extent that it is needed to fulfil its operational needs or to comply with any legal requirements
- Ensure the quality of information used
- Ensure that the rights of people about whom information is held, can be fully exercised under the Act.

These include:

- the right to be informed that processing is being undertaken
- the right of access to one's personal information
- the right to prevent processing in certain circumstances and
- the right to correct, rectify, block or erase information which is regarded as wrong information
- the right to be forgotten
- Take appropriate technical and organisational security measures to safeguard personal information
- Ensure that personal information is not transferred abroad without suitable safeguards
- Treat people justly and fairly whatever their age, religion, disability, gender, sexual orientation or ethnicity, when dealing with requests for information
- Set out clear procedures for responding to requests for information

Data collection

Informed consent

Informed consent is when:

A Data Subject clearly understands why their information is needed, who it will be shared with, and the possible consequences of them agreeing or refusing the proposed use of the data and then gives their consent.

Wise Origin will ensure that data is collected within the boundaries defined within this policy. This applies to data that is collected in person, or by completing a form.

When collecting data, Wise Origin will ensure that the Data Subject:

- Clearly understands why the information is needed
- Understands what it will be used for and what the consequences are should the Data Subject decide not to give consent to processing
- As far as reasonably possible, grants explicit consent either written or verbally for data to be processed
- Is as far as reasonably practicable, competent enough to give consent and has given so freely without any duress
- Has received sufficient information on why their data is needed and how it will be used

Data Subject Access Request (SAR)

A Subject Access Request can be made by an individual whom Wise Origin holds information on. Individuals are entitled to the information that is held on them, why it is held and who this information is disclosed to.

Furthermore they are entitled to be:

- told whether any personal data is being processed;
- given a description of the personal data, the reasons it is being processed, and whether it will be given to any other organisations or people;
- given a copy of the personal data; and
- given details of the source of the data (where this is available).

Data Subjects are not entitled to any information which would disclose information on another individual. If requested this information must be provided within 30 days of the initial request. If you receive a Data Subject Access Request (SAR) this must be reported to management immediately, as this is a time-sensitive matter.

Data Storage

Information and records relating to Data Subjects will be stored securely and will only be accessible to authorised staff and volunteers.

Information will be stored for only as long as it is needed or required statute and will be disposed of appropriately.

It is Wise Origin responsibility to ensure all personal and company data is non-recoverable from any computer system previously used within the organisation which has been passed on/sold to a third party.

Data access and accuracy

All Data Subjects have the right to access the information Wise Origin holds about them. Wise Origin will also take reasonable steps to ensure that this information is kept up to date.

In addition, Wise Origin will ensure that:

- It has a Data Protection Officer with specific responsibility for ensuring compliance with Data Protection
- Everyone processing personal information understands that they are contractually responsible for following good data protection practice
- Everyone processing personal information is appropriately trained to do so
- Everyone processing personal information is appropriately supervised
- Anybody wanting to make enquiries about handling personal information knows what to do
- It deals promptly and courteously with any enquiries about handling personal information
- It describes clearly how it handles personal information
- It will regularly review and audit the way it holds, manages and uses personal information
- It regularly assesses and evaluates its methods and performance in relation to handling personal information
- All staff are aware that a breach of the rules and procedures identified in this policy may lead to disciplinary action being taken against them

This policy will be updated as necessary to reflect best practice in data management, security and control and to ensure compliance with any changes or amendments made to the General Data Protection Regulation.

In case of any queries or questions in relation to this policy please contact the Wise Origin Data Protection Officer.

Review of the Policy

The Data Protection Policy will be revised annually by the Senior Management Team and Director.

Policy Review	Review Date	Next Review Date	Approved by
Annually	29 th June 2025	29 th June 2026	Umair Khan