

Data Protection Policy

1. Policy Statement

Park Street Performing Arts Centre (PSPAC) is committed to protecting the personal data of our beneficiaries, participants, supporters, staff, trustees, volunteers, and freelance workers. We process personal data lawfully, fairly, and transparently, in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and any other applicable laws.

2. Purpose

The purpose of this policy is to:

- Set out how we collect, use, store, and share personal data.
 - Protect the privacy and rights of individuals whose data we hold.
 - Ensure the charity and anyone acting on its behalf comply with data protection law.
-

3. Scope

This policy applies to all personal data processed by PSPAC, in both paper and electronic form, including:

- Beneficiary records.
- Mailing lists and supporter databases.
- Freelance worker contact details, contracts, and payment records.
- Safeguarding and incident reports.

It applies to trustees, volunteers, and freelance contractors when handling personal data on behalf of the charity.

4. Key Definitions

- **Personal Data** – Any information that can identify a living person, directly or indirectly (e.g., name, contact details, images, IP addresses).
 - **Special Category Data** – Sensitive information requiring extra protection (e.g., health, ethnicity, religious beliefs, sexual orientation).
 - **Processing** – Any action performed on personal data, including collection, storage, use, sharing, and deletion.
-

5. Data Protection Principles

We follow these principles:

1. **Lawfulness, fairness, transparency** – We only collect data for legitimate purposes and inform people how it will be used.
 2. **Purpose limitation** – We only use data for the purposes for which it was collected.
 3. **Data minimisation** – We collect only the data we need.
 4. **Accuracy** – We keep data accurate and up to date.
 5. **Storage limitation** – We only keep data as long as necessary.
 6. **Integrity and confidentiality** – We keep data secure through appropriate technical and organisational measures.
-

6. Legal Basis for Processing

We process personal data under one or more lawful bases, including:

- **Consent** (e.g., joining our mailing list).
 - **Contract** (e.g., fulfilling a freelance services agreement).
 - **Legal obligation** (e.g., safeguarding reporting).
 - **Legitimate interests** (e.g., running our charity's events).
-

7. Rights of Individuals

Individuals have the right to:

- Be informed about how their data is used.
- Access their personal data.
- Have inaccurate data corrected.
- Request deletion of their data (where legally possible).
- Restrict or object to certain processing.
- Data portability (transfer to another provider).

Requests should be made to PSPAC at info@parkstreethull.co.uk. We will respond within one month from receipt of request.

8. Data Security

We will:

- Store paper records securely (locked cabinets, restricted access).
- Protect electronic data with passwords, encryption, and secure servers.
- Limit access to personal data to authorised individuals only.

- Use secure methods for data transfer (encrypted email or secure platforms).
-

9. Sharing Personal Data

We will not sell personal data.

We may share data with:

- Service providers who support our operations (e.g., payroll for freelancers, event ticketing systems) — bound by confidentiality agreements.
 - Statutory bodies (e.g., safeguarding boards, HMRC) where required by law.
-

10. Data Retention

We will retain data only for as long as necessary:

- **Financial records (including freelancer invoices)** – 7 years.
 - **Safeguarding records** – As required by law.
 - **Mailing lists** – Until consent is withdrawn.
After this, data will be securely deleted or shredded.
-

11. Data Breaches

Any suspected data breach must be reported immediately to the **Data Protection Lead**.

We will investigate and, if required, notify the **Information Commissioner's Office (ICO)** within 72 hours and affected individuals without undue delay.

12. Training & Compliance

Trustees, volunteers, and freelancers handling personal data on behalf of PSPAC must:

- Read and comply with this policy.
- Complete any required data protection training.