

POLICY

DATA PROTECTION POLICY (UK GDPR)

Policy name	Steel Warriors Data Protection Policy
Owner	Chief Executive Officer
Author	Zoe Byrne, Chief Operating Officer
Last approved by Board	16 July 2025
Last reviewed	16 July 2025
Next review due	16 June 2026

This policy sets out how Steel Warriors handles personal data. For how we use the information of donors, subscribers, participants and website visitors, see our Privacy Policy at steelwarriors.co.uk/privacy. Questions: team@steelwarriors.co.uk.

POLICY STATEMENT

Steel Warriors is committed to protecting the privacy and security of the personal data we collect and process. This Data Protection Policy outlines our approach to handling personal data in compliance with the General Data Protection Regulation (GDPR) and other relevant data protection laws.

SCOPE

This policy applies to all Trustees, employees, workers, volunteers and anyone else handling personal data on behalf of Steel Warriors. It covers all personal data processed by the charity, regardless of the format in which it is held.

KEY DEFINITIONS

- **Personal Data:** Any information that relates to an identified or identifiable individual, such as names, addresses, phone numbers, email addresses, and financial information.
- **Data Subject:** The individual to whom the personal data relates.
- **Processing:** Any operation performed on personal data, including collection, recording, organisation, storage, alteration, retrieval, use, disclosure, or deletion.
- **Data Controller:** The organisation that determines the purposes and means of processing personal data.
- **Data Processor:** Any third party that processes personal data on behalf of the Data Controller.

DATA PROTECTION PRINCIPLES

Steel Warriors is committed to processing personal data in accordance with the following principles:

1. **Lawfulness, Fairness, and Transparency:** Personal data will be processed lawfully, fairly, and in a transparent manner.
2. **Purpose Limitation:** Personal data will be collected for specified, explicit, and legitimate purposes and not further processed in a manner incompatible with those purposes.
3. **Data Minimisation:** Personal data will be adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed.
4. **Accuracy:** Personal data will be accurate and, where necessary, kept up to date.
5. **Storage Limitation:** Personal data will be kept for no longer than is necessary for the purposes for which it is processed.
6. **Integrity and Confidentiality:** Personal data will be processed in a manner that ensures appropriate security, including protection against unauthorised or unlawful processing, accidental loss, destruction, or damage.
7. **Accountability:** Steel Warriors will be responsible for, and able to demonstrate compliance with, these principles.

LAWFUL BASIS FOR PROCESSING

Steel Warriors will only process personal data where there is a lawful basis for doing so. The lawful bases include:

- **Consent:** The data subject has given clear consent for processing their personal data for a specific purpose.
- **Contract:** Processing is necessary for the performance of a contract with the data subject or to take steps at their request before entering into a contract.
- **Legal Obligation:** Processing is necessary to comply with a legal obligation.
- **Safeguarding:** Processing is necessary to safeguard a child or vulnerable adult.
- **Vital Interests:** Processing is necessary to protect someone's life.
- **Public Task:** Processing is necessary to perform a task in the public interest or in the exercise of official authority.
- **Legitimate Interests:** Processing is necessary for the legitimate interests of Steel Warriors or a third party, provided these are not overridden by the rights and interests of the data subject.

DATA SUBJECT RIGHTS

Data subjects have the following rights under GDPR:

1. **Right to be Informed:** Individuals have the right to be informed about the collection and use of their personal data.
2. **Right of Access:** Individuals have the right to access their personal data and obtain a copy.
3. **Right to Rectification:** Individuals have the right to have inaccurate personal data corrected or completed if it is incomplete.
4. **Right to Erasure (Right to be Forgotten):** Individuals have the right to have their personal data erased in certain circumstances.
5. **Right to Restrict Processing:** Individuals have the right to request the restriction or suppression of their personal data.

6. **Right to Data Portability:** Individuals have the right to obtain and reuse their personal data across different services.
7. **Right to Object:** Individuals have the right to object to the processing of their personal data in certain circumstances, including for direct marketing purposes.
8. **Rights in Relation to Automated Decision-Making and Profiling:** Individuals have the right not to be subject to decisions based solely on automated processing, including profiling.

DATA SECURITY

Steel Warriors is committed to protecting the personal data we process. We implement appropriate technical and organisational measures to safeguard personal data against unauthorised access, loss, destruction, or damage. These measures include:

- **Access Controls:** Access to personal data is restricted to authorised personnel only. Additional password protection will be used for sensitive information.
- **Data Backups:** Regular backups are performed to prevent data loss.
- **Training:** All employees and volunteers receive regular training on data protection and information security.

DATA SHARING AND TRANSFERS

- **Third-Party Processors:** Steel Warriors may engage third-party processors to handle personal data on our behalf. These processors are required to comply with data protection laws and will be contractually obligated to protect the personal data they process.

DATA BREACH MANAGEMENT

In the event of a data breach, Steel Warriors will take immediate steps to mitigate the impact of the breach and prevent further unauthorised access. All data breaches will be reported to the Chief Executive and Chair of Trustees, who will decide on the required action which may include a report to the Information Commissioner's Office (ICO) and contacting the affected individuals to make them aware. All data breaches will be recorded and any lessons learnt implemented.

DATA RETENTION

Personal data will be retained only for as long as necessary to fulfil the purposes for which it was collected. Once personal data is no longer needed, it will be securely deleted or anonymised.

TRAINING AND AWARENESS

All employees and volunteers will receive training on data protection and GDPR compliance as part of their induction and on an ongoing basis. This training will cover their responsibilities under this policy and how to handle personal data securely.

ACCOUNTABILITY AND GOVERNANCE

Steel Warriors will maintain records of our data processing activities and demonstrate our compliance with data protection laws. Regular audits will be conducted to ensure ongoing compliance, and any areas for improvement will be addressed promptly.

ROLES AND RESPONSIBILITIES

- **Data Protection Officer (DPO):** Steel Warriors will identify a designated Data Protection Officer who will be responsible for overseeing compliance with this policy and data protection laws.
- **Employees and Volunteers:** All employees, workers and volunteers are responsible for ensuring that they process personal data in accordance with this policy and attend required training.

MONITORING AND REVIEW

This policy will be reviewed annually or whenever there are significant changes to data protection laws or our data processing activities. Any updates will be communicated to all employees and volunteers.

Steel Warriors is a registered charity in England and Wales (1175317). This is the public version of the policy approved by the Board of Trustees on 16 July 2025. The latest version is always at steelwarriors.co.uk/policies.