



**STARBURST
FOUNDATION**

General Data Protection Regulation (GDPR) Policy

SF 017

Starburst Foundation

April 2024

V3.2

Version Control

Version	Date	Status	Policy Owner	Trustee Approval	Comment
1.0	March 2021	Written			
2.0	February 2023	Draft	LM	PW	Under review
3.0	March 2024	Draft	PW		Under review
3.1	March 2024	Draft	PW	TBC	Comments addressed
3.2	April 2024	Completed	PW	11.04.2024	Active

Review April 2026

Contents

Background.....	3
Key definitions.....	3
What is Personal data?	3
General provisions.....	4
Data Protection Principles.....	4
Lawfulness, fairness, and transparency	4
Purpose limitation	4
Data minimisation.....	4
Accuracy	4
Storage limitation	4
Integrity and confidentiality (security).....	5
Accountability.....	5
Breach	5
Duties.....	5
Commitment.....	5
Complaints.....	6
Review.....	6
Contacts.....	6

Background

Starburst Foundation collects and uses personal information (referred to in the General Data Protection Regulation (GDPR) as personal data) about individuals who come into contact with the foundation. This information is gathered in order to enable the foundation to communicate and for other associated functions. The foundation may be required by law to collect, use and share certain information. The foundation is the Data Controller, of the personal data that it collects and receives for these purposes and the individual that the data relates to is known as the Data Subject. Any third party, such as an external supplier (e.g. The Harlington) who may receive personal data in order to conduct their business or role within the foundation, is known as the Data Processor.

The foundation has a Data Protection Officer, who may be contacted via email dpo@starburstfoundation.com [mailto:](mailto:dpo@starburstfoundation.com)

Any questions regarding this Policy should be sent by email to:

dpo@starburstfoundation.com or by writing to Starburst Foundation, Starburst Studios, Old School Lane, Yateley, GU46 6NG.

The foundation adopts a Privacy Policy (SF019: Privacy Policy), which summarises the personal data held about individuals, the purpose for which it is held, and who it may be shared with. It also provides information about an individual's rights in respect to their personal data.

Key definitions

Term	Definition
Foundation	Includes Starburst Applications, Theatre, Technical/Hire, Academy, Property, Studios, Dance, Singers, and all sub-committees of such departments.

Purpose

This policy sets out how the Foundation deals with personal data correctly, securely, and in accordance with the GDPR and other current related legislation. This policy applies to all personal data however it is collected, used, recorded, and stored by the Foundation and whether it is held on paper or electronically.

What is Personal data?

Personal data means any information relating to an identified or identifiable individual. An identifiable individual is one who can be identified, directly or indirectly by reference to details such as a name, an identification number, location data, an online identifier or by their physical, physiological, genetic, mental, economic, cultural or social identity. Personal data includes (but is not limited to) an individual's, name, address, date of birth, photograph, bank details and other information that identifies them.

General provisions

This policy applies to all personal data processed by Starburst Foundation. The Responsible Person shall take responsibility for Starburst Foundations ongoing compliance with this policy. This policy shall be reviewed at every two years by the Trustees and, if deemed necessary, Starburst Foundation will register with the Information Commissioner's Office as an organisation that processes personal data.

Data Protection Principles

Article 5 of the UK GDPR sets out seven principles:

- Lawfulness, fairness and transparency
- Purpose limitation
- Data minimisation
- Accuracy
- Storage limitation
- Integrity and confidentiality (security)
- Accountability

Lawfulness, fairness, and transparency

All data is processed lawfully, fairly, and in a transparent manner in relation to individuals.

Purpose limitation

Data is 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, or statistical purposes shall not be considered to be incompatible with the initial purposes.

Data minimisation

The Foundation will only ask for data that is adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed.

Accuracy

The Foundation will ensure data is accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that is inaccurate, having regard to the purposes for which they are processed, is erased or rectified without delay.

Storage limitation

Data will be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is 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.

Integrity and confidentiality (security)

Data is 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.

Accountability

The Foundation shall be responsible for and be able to demonstrate compliance.

Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, or unauthorised disclosure of, or access to, personal data, Starburst Foundation shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO. Affected individuals will be informed without undue delay.

Duties

Personal data shall not be transferred to a country or territory outside the European Economic Area, unless that country or territory ensures an adequate level of data protection as stipulated by UK GDPR regulations. Data Controllers have a General Duty of accountability for personal data.

Commitment

The Foundation is committed to maintaining the principles and duties in the GDPR at all times. Therefore, the foundation will:

- Inform individuals of the contact details held;
- Inform individuals of the purposes that personal information is being collected and the basis for this (sometimes the reason may be because there is a legal or statutory requirement);
- Inform individuals when their information is shared, and why and with whom unless the GDPR provides a reason not to do this;
- If the Foundation plans to transfer personal data outside the EEA, the Foundation will inform individuals and provide them with details of where they can obtain details of the safeguards for that information;
- Inform individuals of their data subject rights (these can be found in the Privacy Policy);
- Inform individuals that the individual may withdraw consent (where relevant) and that if consent is withdrawn that the Foundation will cease processing their data although that will not affect the legality of data processed up until that point;

- Provide details of the length of time an individual's data will be kept (details can be found in the privacy notice);
- Should the Foundation decide to use an individual's personal data for a different reason to that for which it was originally collected, the Foundation shall inform the individual and where necessary seek consent;
- Check the accuracy of the information it holds and review it at annually;
- Ensure that only authorised personnel have access to the personal information whatever medium (paper or electronic) it is stored in;
- Ensure that clear and robust safeguards are in place to ensure personal information is kept securely and to protect personal information from loss, theft and unauthorised disclosure, irrespective of the format in which it is recorded;
- Ensure that personal information is not retained longer than it is needed;
- Ensure that when information is destroyed that it is done so appropriately and securely;
- Share personal information with others only when it is legally appropriate to do so;
- Comply with the duty to respond to requests for access to personal information (Subject Access Requests);
- Ensure that all members are aware of and understand these policies and procedures;

Complaints

Complaints will be dealt with in accordance with SF002: Complaints Policy. Complaints relating to the handling of personal information may be referred to the Information Commissioner who can be contacted at Wycliffe House, Water Lane Wilmslow Cheshire SK9 5AF or at www.ico.gov.uk.

Review

This policy will be reviewed every 2 years. The policy review will be undertaken by the Data Protection Officer or nominated representative.

Contacts

If you have any enquires in relation to this policy, please contact the Trustees who will also act as the contact point for any Subject Access Requests:

Technical@starburstfoundation.com or by writing to Starburst Foundation, Starburst Studio, Old School Lane, Yateley, GU46 6NG.