

## Data Protection Policy

Updated January 2023

### Definitions

“Centre for International Learning and Leadership”, “CILL”, “we”, “us”, “our” refer to the Centre for International Learning and Leadership Ltd.

“Our website” refers to [www.cill-uk.com](http://www.cill-uk.com)

“Our work” or “our services” refer to the courses, projects, consultancy and other services provided by CILL as described and advertised on our website.

GDPR means the General Data Protection Regulation 2018

DPA means the Data Protection Act 2018

ICO means the Information Commissioner’s Office

“Responsible person” means Andrew Hadley, Director

“Register of systems” means a register of all systems or contexts in which personal data is processed by CILL.

### Principles

CILL is committed to processing data in accordance with its responsibilities under the GDPR and the DPA.

Article 5 of the GDPR requires that personal data shall be:

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

**General provisions**

- a. This policy applies to all personal data processed by us.
- b. The Responsible Person will take responsibility for our ongoing compliance with this policy.
- c. This policy will be reviewed annually or more often if required.
- d. We are currently exempt from registering with the ICO.

**Lawful, fair and transparent processing**

- a. To ensure that our processing of data is lawful, fair and transparent, we shall maintain a Register of Systems.
- b. The Register of Systems will be reviewed annually or more often if required.
- c. Individuals have the right to access their personal data and any such requests made to us will be dealt with in a timely manner.

**Lawful purposes**

- a. All data processing must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests (see ICO guidance for more information).
- b. We will note the appropriate lawful basis in the Register of Systems.
- c. Where consent is relied upon as the lawful basis for processing data, evidence of opt-in consent will be kept with the personal data.
- d. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in our systems.

**Data minimisation**

- a. We will ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- b. Contact and registration forms accessed on or through our websites will only ask for the minimum personal data required for the provision of the product or service being requested.
- c. Unless there is a specific need, we will not collect any "special category data" (i.e sensitive information).

**Accuracy**

- a. We will take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps will be put in place to ensure that personal data is kept up to date.

**Archiving / removal**

- a. To ensure that personal data is kept for no longer than necessary, we will put in place an archiving policy for each area in which personal data is processed and review this process annually.
- b. The archiving policy will specify what data should be retained, for how long, and why.

**Security**

- a. We will ensure that personal data is stored securely using appropriate software that is kept-up-to-date.
- b. Access to personal data will be limited to staff who need access and appropriate security will be maintained to avoid unauthorised sharing of information.
- c. When personal data is deleted this should be done safely so that the data is non-recoverable.
- d. Appropriate back-up and disaster recovery solutions will be put in place.

**Breach**

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, we will promptly assess the risk to people's rights and freedoms and report this breach to the ICO in compliance with the GDPR (more information on the ICO website).