



Ixion Group Policy

Data Protection



Data Protection Policy

This Policy sets out Ixion's commitment to protecting personal data and how Ixion implements that commitment with regards to the collection and use of personal data.

This policy is a Shaw Trust group wide policy.

Why we need this Policy

Ixion is committed to:

- Meeting its legal obligations as laid down by the General Data Protection regulations (GDPR).
- Ensuring that it complies with data protection principles, contained within GDPR, as listed below.
 - Personal data shall be processed fairly and lawfully.
 - Personal data shall be obtained for one or more specified and lawful purposes and shall not be further processed in any manner incompatible with that purpose or those purposes.
 - Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
 - Personal data shall be accurate and, where necessary, kept up to date.
 - Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
 - Personal data shall be processed in accordance with the rights of data subjects under the Data Protection Act 1998.
 - Appropriate technical and organisational measures shall be taken against unauthorised and unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.

- Personal data shall not be transferred to a country or territory outside the EEA (European Economic Area) unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.
- With effect from May 2018, meeting the requirements of the General Data Protection Regulation (GDPR).
- Processing personal data only in order to meet our operational needs or fulfil legal requirements.
- Taking steps to ensure that personal data is up to date and accurate.
- Establishing appropriate retention periods for personal data.
- Ensuring that data subjects' rights can be appropriately exercised.
- Providing adequate security measures to protect personal data.
- Ensuring that a nominated officer is responsible for data protection compliance and provides a point of contact for all data protection issues.
- Ensuring that all staff are made aware of good practice in data protection.
- Providing adequate training for all staff responsible for personal data.
- Ensuring that everyone handling personal data knows where to find further guidance.
- Ensuring that queries about data protection, internal and external to the organisation, are dealt with effectively and promptly.
- Regularly reviewing data protection procedures and guidelines within the organisation.

Who is affected by this Policy?

Full- and part-time employees, volunteers, interns, suppliers, contractors and consultants of Ixion.



Responsibilities

The registered Data Protection Officer for Ixion is: Sejal Patel, Shaw Trust Compliance Director.

Ixion Board of Directors

- Create the working environment which encourages everyone to take personal responsibility for their actions.
- Comply with the Data Protection Guidance Notes.

Ixion Management Board (IMB)

- Create policies, plans and procedures that enable staff to be empowered in line with our values and code of conduct.
- Undertake appropriate data protection awareness training.
- Comply with the Data Protection Guidance Notes.
- Demonstrate top management level commitment to compliance with the GDPR demonstrating its explicit commitment to implement the provisions of the GDPR.

Employees, volunteers, interns, suppliers, contractors and consultants

- Understand and adhere to this policy and all relevant legislation.
- Undertake appropriate data protection awareness training.
- Comply with the Data Protection Guidance Notes.

Ixion IT Department

- Undertake appropriate data security awareness training.
- Maintain compliance with the Data Protection Act 1998 and with the GDPR.
- Oversee and Maintain Subject Access Request process
- Support other departments of Ixion in the interpretation and implementation of the DPA and of the GDPR.



- Provide advice and guidance on the application of this Policy and of the Data Protection Guidance Notes.
- Monitor and review this Policy and the Data Protection Guidance Notes to ensure that they comply with current UK legislation and regulations and are in line with best practice.

Non-compliance

Failure to comply with this Policy and its associated guidance notes could result in disciplinary action being taken against the employee concerned. In certain circumstances, employees could be held criminally liable if they knowingly or recklessly disclose personal data in contravention of Ixion's procedures (which include this Policy). Such action may, in extreme cases, be treated as gross misconduct which could result in summary dismissal.

Review and revision

This Policy will be revised as and when required to take account of developments in legislation, business need and technology. Revisions will be proposed in working conjunction with the Shaw Trust Group Information Security Department.

Further reading

- Access to Personal Data by a Data Subject Procedures
- Data Protection Guidance Notes