

Data Protection Policy

The British Institute for the Study of Iraq

Introduction

BISI needs to gather and use certain information about individuals with whom the organisation has a relationship or may need to contact. This document describes how this personal data must be collected, handled, and stored to meet data protection standards and comply with the law.

The BISI is committed to protecting your personal information. This policy applies to all staff, trustees and volunteers of BISI, and applies to all data BISI holds relating to individuals and companies. All staff, trustees and volunteers are made aware of this policy, but the Council of BISI is responsible for the implementation of this policy.

Data Protection Law

The Data Protection Act 1988 describes how organisations must collect, handle and store personal information. These rules apply regardless of how data is stored. To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully.

The Data Protection Act is underpinned by eight principles. Data must be:

1. Processed fairly and lawfully.
2. Be obtained for specific and lawful processes.
3. Be adequate, relevant and not excessive.
4. Be accurate and up-to-date.
5. Not be held for longer than necessary.
6. Be processed in accordance with the rights of the data subjects.
7. Be protected in appropriate ways.
8. Not be transferred between countries outside of the European Economic Area unless that country also ensures an adequate level of protection.

The General Data Protection Regulation (GDPR), which comes into law on Friday 25th May 2018, is similar to the Data Protection Act, with added detail.

Article 5 of the General Data Protection Regulation (GDPR) requires that personal data shall be:

1. Processed lawfully, fairly and in a transparent manner in relation to individuals;
2. 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;
3. Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
4. 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;

5. 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;
6. 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.

Article 5(2) requires that “the controller shall be responsible for, and be able to demonstrate, compliance with the principles.”

BISI will not:

1. Sell or share data with third parties;
2. Collect personally identifying information (such as name and email address) through its website except when specified and knowingly provided by an individual;
3. Use data collected for purposes not previously specified;
4. Collect sensitive personal data, such as date of birth or full bank details.

When Information is Collected

BISI collects data when an individual:

- Books a ticket to a BISI lecture or event
- Becomes a BISI member
- Enquires about activities and services
- Donates to the Institute
- Signs-up to receive emails and e-bulletins

How Information is Used

BISI may use consensually collected data for the following purposes:

- To provide correspondence on the services, products or information either directly requested or that which the Institute believes may be of interest to the individual.
- To process donations.
- To provide individuals with information and updates about our work and/or activities.
- For internal record keeping, including the management of any feedback or complaints.
- Where it is required or authorised by law.

What information is collected

- Name
- E-mail Address
- Delivery Address
- Phone Number (only when explicitly provided by an individual)

Debit and Credit Card Information:

If a debit or credit card is used to pay for a BISI membership or to make a donation, on our website or over the phone, the BISI will ensure that all payments are processed securely and in accordance with the Payment Industry Data Security Standard.

Responsibilities

Everyone who works for or with BISI has responsibility for ensuring data is collected, stored and handled appropriately.

General Guidelines

- The only people to access data covered by this policy should be those who need it for their work.
- Data should not be shared informally.
- Data should be kept secure by using passwords to protect electronic information and locked filing cabinets for written information and that stored on removable devices.
- Data should be stored on designated drives and servers, and these located in secure locations, with appropriate security software.
- Data should be held in as a few places as possible.
- Data should not be purposefully disclosed to unauthorised persons, and efforts should be made to avoid accidental disclosure.
- Data should be reviewed and updated regularly and deleted/shredded when no longer required.

Data is kept securely for as long as required in accordance with legal, taxation and accounting requirements. Information that is no longer required will be removed in a secure manner.

Subject Requests

All individuals who are subject of personal data held by BISI are entitled to:

- Ask what information the Institute holds about them, and why.
- Ask how to access it and be informed of BISI's data protection obligations.
- Ask for data held about them to be removed in part or whole from the Institute's database.

Requests will be dealt with within 30 days.

Personal data will not be passed on to anyone outside of the organisation without explicit consent from the data owner unless there is a legal duty of disclosure.

Contact

If you have any questions, comments or complaints in relation to how BISI processes personal information please do not hesitate to get in touch with BISI's Data Protection Officer Mrs Joan Porter Maclver: bisi@britac.ac.uk