



Updated: May 2025
Next update due: May 2027

Data Protection Policy

STATEMENT OF GENERAL POLICY

Our **Data Protection Policy** refers to our commitment to treat information of employees, self-employed contractors, participants, donors, funders, trustees and other interested parties with the utmost care and confidentiality. We are fully committed to working in alignment with GDPR standards.

With this policy, we ensure that we gather, store and handle data fairly, transparently and with respect towards individual rights.

SCOPE

This policy refers to all parties (employees, self-employed contractors, participants, donors, trustees, funders etc.) who provide any amount of information to us.

WHO IS COVERED UNDER THE DATA PROTECTION POLICY?

Employees and self-employed contractors of The Pearl Exchange must follow this policy. Contractors, consultants, partners and any other external entity are also covered. Generally, our policy refers to anyone we collaborate with or acts on our behalf and may need occasional access to data.

POLICY ELEMENTS

As part of our operations, we need to obtain and process information. This information includes any offline or online data that makes a person identifiable such as names, addresses, usernames and passwords, digital footprints, photographs, financial data etc.

The Pearl Exchange collects this information in a transparent way and only with the full cooperation and knowledge of interested parties. Once this information is available to us, the following rules apply.

Our data will be:

- Accurate and kept up-to-date
- Collected fairly and for lawful purposes only
- Processed by the charity within its legal and moral boundaries
- Protected against any unauthorised or illegal access by internal or external parties

Our data will not be:

- Communicated informally

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- Stored for more than a specified amount of time
- Transferred to organisations that do not have adequate data protection policies
- Distributed to any party other than the ones agreed on by the data's owner (exempting legitimate requests from law enforcement authorities)

In addition to ways of handling the data, the charity has direct obligations towards owners of the personal data. Specifically, we must:

- Let people know which of their data is collected
- Inform people about how we'll process their data
- Inform people about who has access to their information
- Have provisions in cases of lost, corrupted or compromised data
- Allow people to request that we modify, erase, reduce or correct data contained in our databases

ACTIONS

To exercise the protection of data, we're committed to:

- Restricting and monitoring access to sensitive data
- Developing transparent data collection procedures
- Training employees in GDPR and associated legislation
- Building secure networks to protect online data from cyber attacks
- Establishing clear procedures for reporting privacy breaches or data misuse
- Including contract clauses or communicating statements on how we handle data
- Establishing data protection practices (document shredding, secure locks, data encryption, frequent backups, access authorisation etc.)

DISCIPLINARY CONSEQUENCES

All principles described in this policy must be strictly followed. A breach of data protection guidelines will invoke disciplinary and possibly legal action.

Date created: February 2025

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Date of next review: May 2027

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