

NESS AND BEAULY FISHERIES TRUST

Data Handling Policy

INTRODUCTION

The Trust in pursuance of its charitable objects (which include the preservation, protection, development and improvement of both the Rivers Beaully and Ness and the native fish stocks within their catchments) needs to process personal data. The Trust accepts that it is a data controller for the purposes of the General Data Protection Regulation and that it must comply with the following six principles for the handling of personal data:

- Fairly and lawfully processed;
- Processed for limited purposes;
- Adequate and relevant and limited to what is necessary;
- Accurate and where necessary up to date;
- Not kept in a way that people can be identified from it for longer than is necessary; and
- Processed in a way that ensures appropriate security.

COMPLIANCE

The Trust's officer responsible for compliance with GDPR is Chris Conroy. He will maintain the Trust's databases in compliance with GDPR. The Board will hold four separate databases:

- A Public Task database of data held necessary to uphold the Trust's statutory duties;
- A Contract database with information required in fulfilment of those contracts;
- A Legitimate Interests database held subject to satisfaction of a 'legitimate interests' assessment¹ (LIA assessment); and
- Consent database, all data held under consent of the data subjects.

AUDIT

The Trust will audit its information annually to ensure that its data bases are compliant with the six principles of GDPR. In particular, the audit will ensure:

¹ The LIA assessment requires that the information officer before entering the data on the Legitimate Interests database satisfies him/herself that the Board is pursuing a legitimate interest in so doing, that processing the data is necessary for that purpose and that he/she has considered whether there are any balancing personal issues that override the right of the Board to process that data (for example where that individual has particular vulnerabilities).

- That data is held in compliance with the act
- Data held is accurate
- That no more data is held that is necessary
- That data will be held only for so long as it is needed.

After each annual audit the responsible officer will note that the audit has taken place and that he/she certifies the Trust's databases as being compliant with GDPR.

SECURITY

The Trust will ensure that all the data held is securely stored. This will apply to physical copies of data as well as computer-based data.

REQUESTS FOR INFORMATION

The Trust will respond within 28 days to any written request (including by e-mail) by a data subject for details of information held by the Board on them.

PRIVACY NOTICE

The Trust will publish a Privacy notice on its website.