



# Data Protection Policy

## Introduction

1. Happy Days UK Ltd, (Happy Days) through its Directors, is the Data Controller. The company nominates a member of staff to ensure compliance of the General Data Protection Regulation. (GDPR).

Happy Days will collect, store, use and otherwise process Personal Data about the people with whom it interacts, who are the data subjects. This may include, children, parents, carers, employees, volunteers and students. Also, contractors, suppliers and other third parties.

Happy Days, processes Personal Data so that it can comply with its statutory obligations.

Every data subject has a number of rights in relation to how Happy Days processes their Personal Data. Happy Days is committed to ensuring that it processes personal data properly and securely in accordance with the Data Protection rules, as such commitment constitutes good governance and is important for achieving and maintain the Company and confidence of Data Subjects. Therefore, Happy Days will regularly review its procedures to ensure that they are adequate and up to date.

All staff, volunteers and students of Happy Days who are involved in the processing of personal data held by Happy Days have a duty to protect the data that they process and must comply with this policy. Happy Days will take any failure to comply with this policy or the Data Protection rules very seriously.

## Data Protection Principles

2. Happy Days as the Data Controller is required to comply with the six data protection principles set out in the GDPR, which provide that Personal Data must be:
  - 2.1 Processed fairly, lawfully and in a transparent manner;
  - 2.2 Collected for specified, explicit and legitimate purposes and not further processed for other purposes incompatible with those purposes.
  - 2.3 Adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed.
  - 2.4 Accurate, and where necessary, kept up to date – every reasonable step must be taken to ensure that inaccurate personal data is erased or rectified without delay.
  - 2.5 Kept in a form that permits identification of data subjects for longer than is necessary for purposes for which the personal data is processed: and
  - 2.6 Processed in a way that ensures its security, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational security measures.

## How Happy Days will comply and demonstrate compliance

3. This policy is intended to ensure that any processing of personal data is in accordance with the data protection rules and the data protection principles. Happy Days will therefore:
  - 3.1 Provide the Data Subject with a Privacy Notice.

- 3.2 Be transparent and fair in processing personal data.
- 3.3 Take steps to ensure the accuracy of data at the point of collection and at regular intervals thereafter, including advising data subjects of their right to ask for rectification of personal data held about them.
- 3.4 Securely dispose of inaccurate or out of date data, or data which is no longer required for the purposes for which it was collected.

## Data Security

- 4.1 Passwords are kept confidential, are changed regularly and are not shared between individuals.
- 4.2 Offices, desks and filing cabinets/cupboards are kept locked if they contain personal data of any kind, whether in digital or electronic format or on paper.
- 4.3 Personal Data to be shredded and electronic data securely deleted.

In the event that you become aware that there has been a Data Breach, you must report this immediately to the DPO following the Data Breach Procedure.

## CONTACTS

Any queries regarding this policy should be addressed to Happy Days Data Officer, Tracy Jordan, who can be contacted by email at [Tracy@ happydaysuk.co.uk](mailto:Tracy@happydaysuk.co.uk) or by telephone 01795 424348

Further advice and information can be obtained from the Information Commissioners Office at [www.ico.org.uk](http://www.ico.org.uk).

This policy should be read in conjunction with the Privacy Notice