TalkFIRST
Registered Charity No. 1162110

DATA PROTECTION AND INFORMATION SHARING POLICY

Introduction

This document sets out the obligations of TalkFIRST (the Data Controller) regarding data protection and the rights of people with whom it works in respect of their personal data under the UK Data Protection Act 2008 ("the Act").

This Policy shall set out procedures which are to be followed when dealing with personal data. The procedures set out herein must be followed by TalkFIRST, its employees, trustees, volunteers, sub-contractors or other parties working on behalf of TalkFIRST.

TalkFIRST view the correct and lawful handling of personal data as key to its success and dealings with third parties. TalkFIRST shall ensure that it handles all personal data correctly and lawfully.

The Data Protection Principles

This Policy aims to ensure compliance with the Act. The Act sets out eight principles with which any party handling personal data must comply. All personal data:

"a) processed lawfully, fairly and in a transparent manner in relation to individuals;

b) 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;

c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;

d) 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;

e) 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; and

f) 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."

The Data Controller shall be responsible for, and be able to demonstrate, compliance with the principles

Rights of Data Subjects

Under the Act, data subjects have the following rights:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling.

Personal Data

Personal data is defined by the Act as data which relates to a living individual who can be identified from that data or from that data and other information which is in the possession of, or is likely to come into the possession of, the data controller, and includes any expression of opinion about the individual and any indication of the intentions of the data controller or any other person in respect of the individual.

The Act also defines "special categories of data" as personal data relating to the racial or ethnic origin of the data subject; their political opinions; their religious (or similar) beliefs; trade union membership; their physical or mental health condition; sex life or sexual orientation; genetic data and biometric data.

TalkFIRST only holds personal data which is directly relevant to its dealings with a given data subject. That data will be held and processed in accordance with the data protection principles and with this Policy.

A parental consent form is used to obtain permission prior to contacting relevant services involved with the family.

Processing Personal Data

Any and all personal data collected by TalkFIRST is collected in order to ensure that they can facilitate efficient transactions with third parties including, but not limited to, its customers, partners, associates and affiliates and efficiently manage its

employees, trustees, volunteers, sub-contractors, agents and consultants. Personal data shall also be used by TalkFIRST in meeting any and all relevant obligations imposed by law.

Personal data may be disclosed within TalkFIRST.

TalkFIRST shall ensure that:

- All personal data collected and processed for and on behalf of TalkFIRST by any party is collected and processed fairly and lawfully

  Lawful basis for processing

  - Consent
  - Necessary for contract
  - Public task
  - Legitimate Interest
  - Legal Obligation
  - Vital Interests

- Data subjects are made fully aware of the reasons for the collection of personal data and are given details of the purpose for which the data will be used
- Personal data is only collected to the extent that is necessary to fulfil the stated purpose(s)
- All personal data is accurate at the time of collection and kept accurate and up-to-date while it is being held and / or processed
- No personal data is held for any longer than necessary in light of the stated purpose(s)
- All personal data is held in a safe and secure manner, taking all appropriate technical and organisational measures to protect the data
- All personal data is transferred using secure means, electronically or otherwise
- No personal data is transferred outside of the UK or EEA (as appropriate) without first ensuring that appropriate safeguards are in place in the destination country or territory
- TalkFIRST shall be responsible for, and is able to demonstrate compliance with the principles.
- All data subjects can exercise their rights set out above in Section 3 and more fully in the Act.

Data Protection Procedure

TalkFIRST shall ensure that all of its employees, trustees, volunteers, sub-contractors, agents, consultants, partners or other parties working on behalf of TalkFIRST comply with the following when processing and / or transmitting personal data:

- Personal data may be transmitted over secure networks only;
- Personal data may not be transmitted over a wireless network if there is a wired alternative that is reasonably practicable;
- Personal data contained in the body of an email, whether sent or received, should be copied from the body of that email and stored securely. The email itself should be deleted. All temporary files associated therewith should also be deleted;

- Where Personal data is to be sent by facsimile transmission the recipient should be informed in advance of the transmission and should be waiting by the fax machine to receive the data;
- Where Personal data is to be transferred in hardcopy form it should be passed directly to the recipient. Using an intermediary is not permitted;
- All hardcopies of personal data should be stored securely in a locked box, drawer, cabinet or similar;
- Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
- All electronic copies of personal data should be stored securely, where possible on a drive or server which cannot be accessed via the internet without password protection; and
- All passwords used to protect personal data should be changed regularly and should not use words or phrases which can be easily guessed or otherwise compromised.

Organisational Measures

TalkFIRST shall ensure that the following measures are taken with respect to the collection, holding and processing of personal data:

- A designated officer ("the Designated Officer") within TalkFIRST shall be appointed with the specific responsibility of overseeing data protection and ensuring compliance with the Act.
- All employees, trustees, volunteers, sub-contractors, agents, consultants, partners or other parties working on behalf of TalkFIRST are made fully aware of both their individual responsibilities and TalkFIRST's responsibilities under the Act and shall be furnished with a copy of this Policy.
- All employees, trustees, volunteers, sub-contractors, agents, consultants, partners or other parties working on behalf of TalkFIRST handling personal data will be appropriately trained to do so.
- All employees, trustees, volunteers, sub-contractors, agents, consultants, partners or other parties working on behalf of TalkFIRST handling personal data will be appropriately supervised.
- Methods of collecting, holding and processing personal data shall be regularly evaluated and reviewed.
- The Performance of those employees, trustees, volunteers, sub-contractors, agents, consultants, partners or other parties working on behalf of TalkFIRST handling personal data shall be regularly evaluated and reviewed.
- All employees, trustees, volunteers, sub-contractors, agents, consultants, partners or other parties working on behalf of TalkFIRST handling personal data will be bound to do so in accordance with the principles of the Act and this Policy by contract. Failure by any employee to comply with the principles or this Policy shall constitute a disciplinary offence. Failure by any sub-contractor, agent, consultant, partner or other party to comply with the principles or this Policy shall constitute a breach of contract. In all cases, failure to comply with the principles or this Policy may also constitute a criminal offence under the Act.
- All sub-contractors, agents, consultants, partners or other parties working on behalf of TalkFIRST handling personal data must ensure that any and all of their employees who are involved in the processing of personal data are held to the same conditions as those relevant employees of TalkFIRST arising out of this Policy and the Act.

Access by Data Subjects

A data subject may make a subject access request ("SAR") at any time to see the information which the Company holds about them.

SARs must be made in writing. Upon receipt of a SAR subject access request shall have a maximum period of 1 month (can be extended by up to 2 months if complex) within which to respond. The following information will be provided to the data subject:

- Whether or not TalkFIRST holds any personal data on the data subject
- A description of any personal data held on the data subject
- Details of what that personal data is used for
- Details of any third-party organisations that personal data is passed to
- Details of any technical terminology or codes.

Data Breaches

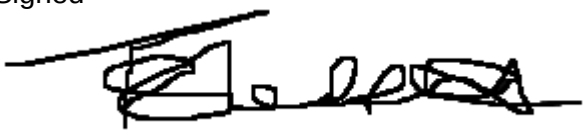
Should a personal data breach occur, TalkFIRST will notify the Information Commissioner's Office (ICO) within 72 hours of becoming aware of the breach, where this is feasible.

If the breach is likely to result in a high risk of adversely affecting individual's rights and freedoms, TalkFIRST will also inform those individuals without undue delay.

TalkFIRST had robust breach detection, investigation and internal reporting procedures in place which will facilitate decision-making about whether or not you need to notify the relevant supervisory authority and the affected individuals.

TalkFIRST will keep a record of any personal data breaches, regardless of whether or not the breach is needs to be notified to the ICO.

Signed



Name: Tracy Sheppard
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