

DATA PROTECTION AND PRIVACY POLICY

- 1 Introduction – A Policy to ensure Protection of Information about our clients, employees and suppliers**
 - 1.1 This policy is to ensure that Thrive Scotland (Thrive) complies with the General Data Protection Regulation (GDPR).
 - 1.2 Thrive Directors review compliance with this Data Protection and Privacy Policy at quarterly board meetings.
- 2 Compliance with GDPR**
 - 2.1. Thrive commits to:
 - Only collect information that we need for a specific purpose,
 - Keep it secure,
 - Ensure it is relevant and up to date,
 - Only hold as much as we need, and only for as long as we need it,
 - Allow the subject of the information to see it on request.
 - 2.2. Thrive recognises that if we handle personal information we may need to register with the Information Commissioner’s Office (ICO) as a data controller, that this is a statutory requirement, and that failure to do so is a criminal offence in the United Kingdom.
- 3. Delegated Checking of ICO’s online Data Protection Self-Assessment and of need to register with ICO**
 - 3.1. Thrive commits to check annually the ICO’s online Data Protection Self-Assessment Toolkit for an assessment of our records management, security and handling of subject access requests, and whether we need to register with the ICO. Thrive delegates this checking to its Finance Director or other finance staff or consultants working for Thrive.
- 4. Oversight of compliance with GDPR**
 - 4.1. The Finance Director leads review of compliance at every quarterly Board meeting, and makes a recommendation to every quarterly Board meeting of whether Thrive needs to register with the ICO.

5. Policy review

Policy owner	Director of Finance
Reviewed annually	Board of Directors
Policy date	August 2019
Next policy review date	August 2020