

Personal Data Processing Policy

Reference GDPR DOC 1.3

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1. Scope

This policy applies to [Organisation Name] and all those working under its control (permanent and temporary employees, contractors and workers). It applies to all processing of personal data as defined in the General Data Protection Regulation (GDPR), and to all processing of personal data contracted out to third parties.

2. Definitions

Personal data is “<<Content removed for sample purposes>>”

Processing is “<<Content removed for sample purposes>>”

3. Policy

The GDPR sets out a number of data processing principles, which [Organisation Name] is committed to upholding and supports this by providing mechanisms to ensure that all processing of personal data complies with these principles.

The GDPR's data processing principles and [Organisation Name]'s key mechanisms for complying with them are set out below.

3.1 Lawfulness, fairness and transparency

There must be a lawful basis for all personal data processing, the processing must be fair to the data subject, and the data subject must be given clear information about the processing.

3.1.1 [Organisation Name] maintains an Article 30. **Record of Processing Activities**. The **Record of Processing Activities** is maintained by the Data Protection Officer/GDPR Owner and is made available to the Information Commissioner's Office (ICO) and/or other relevant supervisory authorities. upon request.

3.1.2 All new and personal data processing activities and changes to existing activities are subject to the **Privacy by Design Procedure**, which ensures that processing activities are lawful and fair.

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3.1.5 <<Content removed for sample purposes>>

3.1.6 This principle is also supported by the **Data Subject Rights Policy**, which addresses how [Organisation Name] facilitates data subject rights requests, such as through data subject access requests (DSARs).

3.2 Purpose limitation

Personal data may only be collected for specified, explicit and legitimate purposes, and cannot be processed for any other purpose.

3.2.1 [Organisation Name] sets out the purpose for processing in the **Record of Processing Activities** and no processing of personal data other than for those purposes is permitted.

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3.3 Data minimisation

The personal data collected must be adequate, relevant and limited to what is necessary to achieve the defined purposes of the processing.

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3.3.2 The volume of data necessary for a given purpose is assessed through data protection impact assessments (DPIAs) as set out in the [Data Protection Impact Assessment Procedure](#).

3.4 Accuracy

Personal data must be accurate and, where necessary, kept up to date.

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3.5 Storage limitation

Personal data must not be retained in a form that can identify the data subject for any longer than is necessary to achieve the purpose of the processing.

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3.5.2 <<Content removed for sample purposes>>

3.6 Integrity and confidentiality

Personal data must be processed in such a way that the integrity and confidentiality of the data is protected.

3.6.1 [Organisation Name] has an [Information Security Policy](#) that addresses the confidentiality, integrity and availability of data in information systems.

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3.6.3 <<Content removed for sample purposes>>

3.6.4 Personal data is not shared with any third parties except those

authorised under the [Data Sharing Procedure](#).

3.7 Accountability

The data controller is responsible for ensuring that all processing under its control complies with the previous principles.

3.7.1 [Organisation Name] maintains records demonstrating that all personal data processing complies with these principles, and with the organisation's data protection policies and procedures.

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