DATA PRIVACY POLICY

WIZEUP FINANCIAL EDUCATION

Contents

1. Data Protection Policy

1.1 Our Aims

WizeUp Financial Education aim to follow the UK General Data Protection Regulation (UK GDPR), along with the Data Protection Act 2018. This policy will apply to all personal data, whether this be in hard or electronic copies.

- **Personal Data is defined as any information relating to an identified, or identifiable, individual. This may include the individual's:**

- **Name**
- **Identification Number**
- **Location Data**
- **Online Identifier, such as username**
- **It may also include factors specific to the individuals physical, psychological, genetic, mental, economic, cultural or social identity.**

- **Special Category Data is personalised data which is more sensitive and so needs more protection, including information about an individual's:**

- **Racial or ethnic origin**
- **Political opinions**
- **Religious or philosophical beliefs**
- **Trade union membership**
- **Genetics**
- **Biometrics (such as fingerprints, retina and iris patterns), where used for identification purposes**
- **Physical or mental health or condition**
- **Sex life or sexual orientation**

- **Processing can be defined as anything done to personal data, such as collecting, recording, organising, structuring, storing, adapting, altering, retrieving, using, disseminating, erasing or destroying. Processing can be automated or manual.**

- **Data subject, according to the Information Commissioner's Office, personal data is information that relates to an identified or identifiable individual.**

- **Data Controller is the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.**

- **Data Processor, according to the Information Commissioner's Office, a Data Processor is a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller. Processors act on behalf of the relevant controller and under their authority. In doing so, they serve the controller's interests rather than their own.**

- **Consent, according to the Information Commissioner's Office, consent is defined as any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her".**

- **Personal Data Breach, according to the Information Commissioner's Office, a personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. This includes breaches that are the result of both accidental and deliberate causes.**

Primary person who is responsible for implementation and maintenance of this policy.	Ed Flack
Review Date	July 2022
Adopted	August 2022
Next review	July 2024

2. Data Controller

Ed Flack processes personal data in relation to its different contacts at various educational establishments, as well as trustees and volunteers. Therefore, he is a Data Controller and is seeking membership through the name of WizeUp Financial Education with the ICO.

3. Roles & Responsibilities

All trustees and volunteers hold the responsibility in making sure they follow everything that has been put forward within this policy. Failure to do so may result in disciplinary action.

The Board of Trustees are responsible of making sure Ed Flack and those who are associated with WizeUp Financial Education complies with this policy.

4. Data Protection Officer

In the considered opinion of the Trustees, the scope and nature of the personal data held by the charity is not sufficient to warrant the appointment of a Data Protection Officer.

However, the Trustees have appointed Ed Flack as the Data Controller of the charity.
Only the Data Controller will have access to the personal data held by the charity.

5. Trustees

The Board of Trustees represent WizeUp Financial Education and have therefore made the decision for Ed Flack to operate as the data controller on their behalf. They will continue to make sure that the Data Protection policy is followed and hold the right to make changes to the Data Controller.

6. Associates or those involved with WizeUp Financial Education

Associates or those working with WizeUp Financial Education should inform the Data Controller of any changes to their personal data.

They should also approach the Data Controller regarding:

- Any questions or concerns regarding the actions of this policy.
- If they are unsure whether they can use personal data in a specific way.
- If there has been a data breach or if they are uncertain as to whether one may have occurred.
- Whenever they are involved within an activity that might breach privacy rights.
- Should they be sharing any information with third parties.
- Be reliant on consent, privacy notices, data protection rights or transferring data outside of the charity.

7. Data Protection Principles

WizeUp Financial Education are committed to following the data principles set out by the UK GDPR. These include that personal data must be:

- Processed lawfully, fairly and in a transparent manner.
- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- Adequate, relevant and limited to what is necessary.
- Accurate and kept up to date.
- Kept in a form which permits identification of data subjects for no longer than is necessary.
- Processed in manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage.

8. Collecting Personal Data - Lawfulness, fairness and transparency

We will only process and register personal data if:

- We need to comply with a legal obligation.
- Ensure the vital interests of an individual.
- Perform a task within the public interest and carry out the charities commitments.
- An individual has given clear consent.

For special categories of personal data, we will also meet one of the special category conditions for processing which are set out in the UK GDPR and Data Protection Act 2018. Further information can be found on the ICO's website.

9. Collecting Personal Data - Limitation, minimisation and accuracy

We will only use an individuals personal data for legitimate reasons, explaining to them why we need it when on collection.

An individual will always been notified should we wish to use their personal data for other reasons following on from the original moment of collection.

Once information is not needed anymore, it must be deleted or anonymised with immediate effect.

10. Sharing Personal Data

WizeUp will never share any personal data about an individual unless they pose a safety risk to WizeUp Financial Education and the persons within the charity.

We may also share personal data about an individual should it be required by the emergency services, law enforcement or governing bodies.

11. Subject Access Requests and other rights of individuals

Individuals may make a 'subject access request' (SAR) to gain personal information to which WizeUp Financial Education holds about them. Any request must be made directly to the Data Controller.

WizeUp Financial Education will acknowledge receipt of an SAR within 48 hours and will respond substantively within one month of receipt.

The Information Commissioner's Office guide provides very useful background information and is essential reading for those who have to deal with SARs.

Finally, all communications from WizeUp Financial Education must be made through the address office@wizeupfinancialeducation.co.uk. No trustees or associates must use their personal email as this would in effect breach data security for that individual and, in some instances, potentially open safeguarding risks.

12. Children and subject access requests

Children hold the right to their personal data, not their parents or carers. A parent or carer may only make an access request should their child not be able to understand their rights or if the child has given consent.

Children who are 12 or above are deemed as mature enough to make a decision regarding a SAR. Therefore, parents or carers would not be granted access to their Childs data without the Childs permission.

13. Information needed in order to submit a SAR

To complete a SAR, the Data Controller will require:

- Two forms of identification.
- A conversation to confirm subject access has been requested. The request can be made via phone, Zoom/Teams or in writing.
- Ask for a submission in writing. However, we recognise that this may present an obstacle for some individuals, so where necessary we will accept a request by other means.

We will not disclose any information should we feel that the information will put the person, especially the child, in danger.

Should an individual make an SAR more than twice, the charity will request for administration costs to be covered.

14. Other data protection rights of the individual

Any individual may withdraw their consent at any time, this may be for marketing usage or other such means. Furthermore, they may issue a complaint with the ICO should they feel WizeUp Financial Education are not fulfilling their responsibilities correctly. Any requests or questions must be put to the Data Controller in writing.

15. Photographs and Videos

Some WizeUp events may have photographs or videos created.
Should this be the case WizeUp will seek to obtain written permission from the parent/carer/pupil involved, explaining clearly how the images will be used. This process should be communicated clearly to the school, college or academy at least seven days ahead of the visit.

Footage may be used on our website, social media pages or for other marketing materials. Furthermore, images may be used by external sources such as newspapers, advertisements and campaigns.

Consent can be withdrawn at anytime. Should this happen the image or footage will be deleted with immediate effect.

Any images or videos used will not involve any further information of the child within the image in order to make sure they are unidentifiable.

16. Disposal of Records

Personal data that is no longer needed will be disposed of securely. Personal data that has become inaccurate or out of date will also be disposed of securely, where we cannot or do not need to rectify or update it.

17. Personal Data Breaches

WizeUp Financial Education will make all reasonable endeavours to ensure that there are no personal data breaches.

In the event of a suspected data breach, we will report the data breach to the ICO within 72 hours. Such breaches could include, but are not limited to:

- A non-anonymised dataset being published on a website which shows sensitive personal data

- Safeguarding information being made available to an unauthorised person.

- The theft of a laptop containing non-encrypted personal data about trustees, staff, associates or our clients.

18. Training

All trustees, staff and associates will be provided with data protection training as part of their induction process. Refresher training will also be provided before the start of each academic year. The key topic being covered in training will be what to do if a data breach occurs.

19. Monitoring

The Data Controller is responsible for the day to day management and operation of this policy, including its continuing appropriateness and applicability. The Trustees will formally review the policy every two years from its inception unless circumstances dictate that it should be considered earlier.