



NICGC Data Protection Policy

Data Protection Principles

The NICGC is committed to processing data in accordance with its responsibilities under the Data Protection Act (2018) and the General Data Protection Regulation (GDPR). Article 5 of the GDPR requires that personal data shall be:

- processed lawfully, fairly and in a transparent manner in relation to individuals
- 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
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed
- 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
- kept in a form which permits identification of data subjects 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;
- 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.

General Provisions

This policy applies to all personal data processed by the NICGC.

The NICGC Board holds overarching responsibility for ongoing compliance of the policy.

The policy shall be reviewed annually.

The NICGC is a not-for-profit organisation which is exempt from registering with the Information Commissioner's Office. However, the NICGC recognises its obligation to comply with legislation.



Lawful, Fair and Transparent Processing

To ensure its processing of data is lawful, fair and transparent, the NICGC shall maintain a Register of Systems.

The Register of Systems shall be reviewed annually.

Individuals have the right to access their personal data and any such requests made to the NICGC shall be dealt with in a timely manner.

Lawful Purposes

All data processed by the NICGC must be done on one of the following lawful bases; consent, contract, legal obligation, vital interests, public task or legitimate interest.

The NICGC shall note the appropriate lawful bases within the Register of Systems.

Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.

Where communications are sent to individuals based upon their consent, the individual will be able to easily revoke this consent. Any revocation of consent will be recorded within the Register of Systems.

Data Minimisation

The NICGC shall ensure that that personal data is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

Data will often be processed at the request of partner organisations, such as Games Organising Committees. Participation at Commonwealth Games as part of TeamNI relies on the sharing of this data and the relevant consent is therefore assumed once an individual submits their data to the NICGC.

Accuracy

The NICGC shall take reasonable steps to ensure that personal data is accurate.

Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.



Archiving/Removal

To ensure that personal data is kept for no longer than is necessary, the NICGC shall put in place an archiving policy for each area in which personal data is processed. This policy will be reviewed annually.

The archiving policy shall consider what data should/must be retained, for how long and why.

Security

The NICGC shall ensure that personal data is stored securely using modern software that is kept up to date.

Access to personal data shall be restricted to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.

When personal data is deleted this should be done safely such that the data is unrecoverable.

Appropriate back up and disaster recovery solutions shall be in place.

Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data the NICCG shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the Information Commissioner's Office.