

1.6 PRIVACY AND DATA PROTECTION POLICY

Article 1: Scope and Regulatory Framework

1.1. Autism Dogs Charity (the "Charity") is committed to the transparent and lawful processing of personal data. This Policy establishes the mandatory standards for the collection, storage, and dissemination of information belonging to Handlers, Representatives, staff, and volunteers.

1.2. All data processing activities shall be conducted in strict accordance with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

1.3. This Policy operates in conjunction with Clause 17 of the **AUTISM DOGS - CONDITIONS**, ensuring that personal data is utilized solely for the provision of Services as defined in the contract.

Article 2: Definitions of Protected Data

2.1. **Handler Contact Details:** Includes names, residential addresses, telephone numbers, and digital communication identifiers provided during the Enrolment Term.

2.2. **Medical Documents:** Refers to sensitive health records, vaccination certificates, and final health check reports for Matched Assistance Dogs, as well as medical information provided by the Handler to facilitate Profiling Services.

2.3. **Deliverables:** Includes data, reports, and specifications developed during the Service Term which may contain personal identifiers or sensitive family information.

Article 3: Confidentiality and Personnel Obligations

3.1. All Charity personnel, including trustees, employees, and authorized volunteers, are required to execute a formal **Non-Disclosure and Confidentiality Agreement** as a condition of their engagement.

3.2. Access to sensitive data, particularly Medical Documents and Handler profiling information, is restricted to authorized staff who require such access to perform their professional duties.

3.3. Unauthorized disclosure of confidential company information or personal client data constitutes a material breach of the Charity's code of conduct and may result in disciplinary action or termination of employment.

Article 4: Secure Data Management and Storage

4.1. Digital Security: All digital records and communication logs are maintained on safe, cloud-based servers. Access is protected via multi-factor authentication and unique user credentials.

4.2. Physical Security: Any hard-copy documents containing personal data are secured in fire-resistant, locked filing cabinets within restricted areas of the Charity's principal office at Millpool Farm.

4.3. Transit Protocols: Personal data transferred electronically must be encrypted. Physical transport of sensitive documents (e.g., during Home Visitations) must follow the protocols established in the **Lone Worker and Home Visitation Safety Policy** of the Charity.

Article 5: Data Subject Rights and Breach Response

5.1. Individuals maintain the right to access, rectify, or request the erasure of their personal data, subject to the Charity's legal and insurance obligations for record retention. **5.2. In the event of a suspected or confirmed data breach, the Charity shall activate its emergency response protocol, notifying the Information Commissioner's Office (ICO) and affected individuals within 72 hours where required by law.**

Article 6: Data Retention and Secure Disposal

6.1. Personal data shall be retained for the duration of the Aftercare Term and for a period of six (6) years following the termination of the Contract to comply with financial and regulatory requirements.

6.2. Upon expiration of the retention period, physical records shall be destroyed via cross-cut shredding, and digital records shall be permanently purged from all servers using industry-standard data erasure methods.

Signatures

The CEO

Caroline Preston

The Chair of the Board of Trustees

Tom Wilde

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