



## **Data Protection Policy**

Created:	May 2018
Assessed:	May 2018
Assessment Due:	May 2019

## **Introduction**

Heritage & Archaeological Research Practice Ltd needs to gather and use certain information about individuals. These can include customers, suppliers, business contacts, employees and other people the organisation has a relationship with or may need to contact. This policy describes how this personal data must be collected, handled and stored to meet the company's data protection standards, and to comply with the law.

Responsibility for making sure that Heritage & Archaeological Research Practice Ltd fulfils its obligations under this Policy rests with Ian Hill, Director.

## **Why does this Policy exist?**

This data protection policy ensures Heritage & Archaeological Research Practice Ltd and all of their staff:

- Complies with data protection law and follow good practice.
- Protects the rights of staff, customers and partners.
- Is open about how it stores and processes individuals' data.
- Protects itself from the risks of a data breach.

All individuals within this organisation are responsible for compliance with this Policy. All external persons connected with Heritage & Archaeological Research Practice Ltd, and who are party to relevant information and data, are required to hold the same responsibility and commitment.

## **What will we do?**

We will make sure that all our staff, sub-contractors, volunteers, and customers are aware of our Data Protection Policy, and where applicable will make them aware of their responsibilities.

## **Data Protection**

The General Data Protection Regulation describes how organisations, including Heritage and Archaeological Research Practice Ltd, must collect, handle and store personal data and information. These rules apply regardless of whether data is stored electronically, on paper or on other materials. To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully. This regulation applies to data of citizens of the European Union, but as an organization, we have decided to implement these rules for all of the data that we store.

## **What data do we collect and/or store?**

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The data that Heritage and Archaeological Research Practice Ltd collects and stores has been willingly submitted by staff, partners, volunteers, or customers, as part of a project or role that the individual has been involved in with Heritage and Archaeological Research Practice Ltd, or through expressing an interest to take part in such an activity. In general this data will include, but not be limited to and:

- An individual's name;
- Email Address;
- Postal Address;
- Age;
- CVs;
- Health conditions;
- Permissions and Consents;
- Bank details.

### **How do we store your data?**

In general, the majority of data that Heritage and Archaeological Research Practice Ltd store is done so in a digital format. Where data is stored in a paper format, the same information may also have been reproduced digitally. All paper and digital records are stored securely in our offices. All of our digital records are stored on our main computer system, and are backed up onto an external hard drive. No records are stored in online storage facilities, and the records are only accessible by members of staff of Heritage and Archaeological Research Practice Ltd.

### **Sharing your data**

We will never share your data with a third party, unless your permission has been granted, or it has been supplied to us through a third party, for instance a third party payment system such as PayPal.

### **How long do we store the data for and why?**

We store different types of data for different periods of time, and only to a time frame that is regarded as 'no longer than necessary'. The following table provides a breakdown for the types of data that we store, how long we will keep it for, and the justification for keeping the data. At any time, you have the right to request access to what data we store on you, and you have the right to request that we destroy it.

<b>Data</b>	<b>Length of Storage</b>	<b>Reason</b>
Email address	Until requested otherwise	To comply with GDPR, we have adopted an 'opt-in' strategy for email marketing. As such, we will ensure that your email address will only be kept within our system, and on our mailing list until you tell us to remove it. Where your email address is stored as part of a payment system through a third party, for instance PayPal, the data will be stored within the third party's system in accordance with their regulations.
Postal Address	12 months after last use	We will have your postal address on file, either as a result of you ordering goods from us, or as a result of you completing an application form to take part in one of our projects. As a rule, we do not send out physical mail or advertising, and will only use your address when explicitly needed within the bounds of our business. If we have your address on file we will remove it from our records within 12 months of your receiving goods from us, or within 12 months of you having completed a project or event with us.
Age/Date of Birth	12 months after last use	We may have your age or date of birth on file, as a result of you completing an application form to take part in one of our projects. As a rule, we do not request ages or date of birth, rather, we request an age range, however some people do provide us with this information. If we have your age or date of birth on file we will remove it from our records within 12 months of you having completed a project or event with us.
CV	36 months after last use	If we have received a CV from you in response to a vacancy, or through an enquiry regarding potential vacancies, we will keep your CV on file for 36 months. This is to allow us to contact you should an appropriate vacancy come up within that time. Data contained within your CV, such as those listed above (email address, postal address, date of birth) will be handled and stored in the terms relating to the storage of CVs, and not the individual items outlined above.
Health Conditions	36 months after last use	We may have certain health conditions on file, as a result of you completing an application form to take part in one of our projects. As a rule, we require these details in order to make an informed decision on acceptance/be in an informed decision of your physical and/or mental condition during your work with us. If we have your medical conditions on file we will remove it from our records within 3 years of you having completed a project or event with us. This is to ensure that there is reasonable evidence should any dispute arise between yourselves and us during, or after, any activity that you have engaged in with us.
Signed consents for Risk Assessments	36 months after last use	It is a requirement when taking part in our projects or activities that you have read, understood, and signed, a project specific Risk Assessment, detailing the potential risks involved and the measures put in place to mitigate against this. The signed confirmation will be removed from our records within 3 years of you having completed a project or event with us. This is to ensure that there is reasonable evidence should any dispute arise between yourselves and us during, or after, any activity that you have engaged in with us.
Permissions and Consents for using photographs and/or visual content	Until requested otherwise	During work on our projects and activities, we use audio and visual records to keep a record of our work, some of which are used for marketing and advertising purposes, or within reporting procedures that we need to carry out. For any of this to be used that includes images or audio recordings of yourself, we always require a consent form to be completed by you. As these records will be relevant for future work, advertising, and reporting, we will keep these records on file until explicitly requested to remove them by you.
Bank Details	36 months after last use	We may have bank details held on file for you as a result of you having been a member of staff, a sub-contractor, or customer. These records will be kept on file for up to 36 months in order to be able to process any refunds, payment disputes, or to be able to reinstate payments to sub contractors and/or employees who have re-joined our organisation. This is also to comply with any potential tax investigations or audits carried out by HMRC.

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### **Your rights to access**

You have a right to know what data we hold on you, and can request this information from us. We will provide this information to you free of charge, and within 28 working days of your request.

### **How will we know if the Policy is working?**

The working of the Data Protection Policy will be monitored by Ian Hill, Director, on an annual basis, or sooner if necessary.

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