



INFORMATION SECURITY AND GDPR

Athena Policies

Version	Date approved	Approved by	Review date
2	15/03/2023	Athena Board	13/03/2024

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1. Overview

1.1. Athena is committed to ensuring that it complies with Data Protection legislation when processing personal data within the course of its business. As part of this, we are required to inform people about how we collect, use, share and store personal information. This privacy notice provides information about how we ensure we process such information in a lawful, fair, and transparent manner.

2. How we protect personal data

2.1. Data security is very important to us. We will ensure that:

- a. Your data is always kept safe and secure.
- b. Handle your information responsibly and respect your confidentiality.
- c. Only collect and process data where it is necessary for us to do so.
- d. Securely delete / destroy data when it is no longer required.
- e. Be open with you about how we use your data and who we may share it with respect to your privacy rights.

3. How we share personal data

- 3.1. There may be occasions where we share your data. This may happen when:
- 3.2. A third party provides a service on our behalf (for example delivery of a specific contract)
- 3.3. Where there is a legal requirement to do so (for example to prevent and detect crime, in line with the data protection exemptions provided by regulations)
- 3.4. Where we are working in partnership with another organisation (for example a support agency or local authority).
- 3.5. In some instances, data may be transferred outside of the European Union. In all cases, we will take adequate steps to ensure the security and protection of your personal information.
- 3.6. This is an example of processing wholly or partly by automated means which means you have specific rights.
- 3.7. Athena protects its staff from violence, threatening behaviour, and verbal abuse. Our staff can now use devices to monitor and record incidents where they feel their personal safety is at risk. Audio recordings obtained through these devices may be used to take sanctions against offenders and may be used in criminal and civil proceedings.

4. Data subject rights

4.1. Under the GDPR, you have rights relating to how we process your personal data.

These rights include:

4.2. Right to be informed

4.2.1. You have the right to ask us to explain why your information is collected, how it is used, how long it will be stored for, and who it is shared with.

4.3. Right to access

4.3.1. You have a right to access your personal data, this is called a Subject Access Request (SAR).

4.3.2. If you would like to submit request, please visit the SAR page on the website. Alternatively, you may complete and return our Subject Access Request Form

which is available on request. You may also submit your request verbally or in writing.

4.3.3. There may be some occasions when we are unable to provide you with some information for example, if it was provided in confidence or if it relates to a criminal proceeding.

4.4. Right to rectification

4.4.1. We work to ensure that all personal data held about you is accurate and correct. However, there may be times when the information we hold is no longer accurate. If this is the case, please contact us and we will update it for you.

4.5. Right to erasure

4.5.1. In some circumstances, you have the right to request the deletion of your personal data. This is not a guaranteed right as we may have a legitimate reason to keep the information. For example, an existing customer could not be forgotten as there is a distinct legal basis for Athena to be processing that data (the information is necessary for the performance of a contract). We would not be able to provide services to customers without using the personal data.

4.5.2. Where information is needed to fulfil statutory obligations, personal information shall be retained for those purposes, and so this right may not be applicable in those situations.

4.6. Right to restriction

4.6.1. Where information cannot be erased you have the right to restrict the processing of your personal data. This limits how we use your personal information.

4.6.2. Where processing is based on your consent, you have the right to withdraw that consent. This can be actioned by you at any time.

4.7. Right to data portability

4.7.1. In certain circumstances you have the right to have your personal data transferred from one organisation to another. This right only applies to information you have provided to us, and it does not apply to paper records.

4.8. Right to object

4.8.1. You have the right to object to the processing of your personal data. Should you object to any processing please contact us with?

4.8.2. the details of your objection and we will take your concerns into account. This does not necessarily mean your data will be erased, instead we may restrict the processing.

4.8.3. You have the right to object to direct marketing communications. This can be actioned at any time and we will update our records accordingly.

4.8.4. You also have the right to object to any processing conducted wholly or partly by automated means. If you object to the decision you can request it be reviewed manually by a member of the organisation.

4.9. Rights related to automated decision making and profiling.

4.9.1. You have the right to not be subject to a decision that is made solely by automated means, including profiling, so long as the decision produces a legal effect.

4.9.2. Should you wish to object/not be subject to any automated decision please let us know any we will update our records.

5. Further information

5.1. For further information about Data Protection, please visit the Information Governance page or for more general information, please visit the Information Commissioner's Office website (external website).

6. Strategic links

6.1. This policy will detail how the organisation will comply with the following:

- a. General Data Protection Regulation (GDPR) 2018
- b. Data Protection Act (DPA) 2018
- c. The policy is closely linked to Athena's internal policies and procedures:
- d. Information Governance Policy 2021
- e. Data Subject Rights Policy 2021