



## The Online Memorial and Museum of Prisoners of War

Charitable Incorporated Organisation, [registered charity number 1200975](#).

### DATA PROTECTION POLICY

#### Purpose of this policy

This Data Protection Policy is a statement that sets out how the Prisoners of War On-Line Memorial and Museum (registered charity Number 1200975), its members, trustees and its associates protects personal data. It is a set of principles, rules and guidelines that informs how the charity ensures ongoing compliance with the data protection laws.

#### Definitions

|                             |  |
|-----------------------------|--|
| <b>Charity</b>              | means Prisoners of War On-Line Memorial and Museum, a registered charity.                    |
| <b>GDPR</b>                 | means the General Data Protection Register.  |
| <b>Responsible Person</b>   | The name of person responsible for data protection within the Mr R J Sharratt.               |
| <b>Register of Systems</b>  | means a register of all computer systems in which personal data is processed by the Charity. |
| <b>Personal Information</b> | This can include: Name, address, telephone number, email address,                            |

The Online Memorial & Museum of Prisoners of War is registered with the UK Information Commissioner's Office Registration reference: ZB659656

#### 1. Data protection principles

The Charity is committed to processing data in accordance with its responsibilities under the GDPR. (General Data Protection Register)

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 for 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.”

## **2. General provisions**

- This policy applies to all personal data processed by the Charity.
- The Responsible Person shall take responsibility for the Charity’s ongoing compliance with this policy.
- This policy shall be reviewed at least annually.
- The Charity shall maintain registration with the Information Commissioner’s Office
- 3. Lawful, fair and transparent processing
- To ensure its processing of data is lawful, fair and transparent, the Charity shall maintain a Register of Systems. (see appendix A)
- The Register of Systems shall be reviewed at least annually.
- Individuals have the right to access their personal data and any such requests made to the charity shall be dealt with in a timely manner.

## **4. Lawful purposes**

- All data processed by the charity must be done on one of the following lawful bases: consent, contract, legal obligation, vital

interests, public task or legitimate interests ([see ICO guidance for more information](#)).

- The Charity shall note the appropriate lawful basis in 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 on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the Charity's systems.

## **5. Data minimisation**

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

## **6. Accuracy**

- The Charity shall take reasonable steps to ensure 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.

## **7. Archiving / removal**

- To ensure that personal data is kept for no longer than necessary, the Charity shall put in place an archiving policy for each area in which personal data is processed and review this process annually.
- The archiving policy shall consider what data should/must be retained, for how long, and why. Date of Annual review: ????

## **8. Security**

- The Charity shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- Access to personal data shall be limited 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 irrecoverable.
- Appropriate back-up and disaster recovery solutions shall be in place.

## **9. 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 Charity shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO ([more information on the ICO website](#)).

## 10. Rights of Individuals:

- **Right to be informed:** organisations must tell individuals what data is being collected, how it's being used, how long it will be kept and whether it will be shared with any third parties.
- **Right of access:** individuals have the right to request a copy of the information that an organisation holds on them.
- **Right of rectification:** individuals can correct inaccurate or incomplete data.
- **Right to be forgotten:** in certain circumstances, individuals can ask organisations to erase any personal data stored on them.
- **Right to object to Processing:** - You have the right to object to the processing of your personal information in certain circumstances.

Date: 14th Oct 2024. Written by: RJS Due for review October 2025

### Change Record:

Date of Change Changed by Comments Date of approval by Trustees

| Date of Change: | Changed by: | Comments:  | Date of approval by Trustees: |
|-----------------|-------------|--|-------------------------------|
| 15/1/2024?      | RS          | Original   | August 2023                   |
| August 2024     | MJS         | Format to Standard.<br>Responsible person appointed. | 14th Oct 2024                 |
|                 |             |  |                               |
|                 |             |  |                               |

### The objects of the CIO # 1200975 are:

To advance the education of the public on the subject of prisoners of war by:

- Providing a permanent, online Memorial & Museum of Prisoners of War by maintaining and regularly updating an interactive, historical and educational internet resource which enables the collection and preservation of information concerning prisoners of war
- By organising seminars, conferences and tours that educate the public on the experiences of prisoners of war, and to pursue any other activities that support these purposes.
- The commemoration and remembrance for the public benefit, of former prisoners of war and the sacrifices they made

**Appendix A.****List of POWMM Computers holding personal information:**

| <b>Device:</b>          | <b>Function:</b>   | <b>Number:</b> |
|-------------------------|--|----------------|
| MS OneDrive             | Formal documents relating to the creation and management of the charity are held in MS OneDrive. Access is limited to trustees and is password protected at the folder level. Trustees who access this do so on password protected equipment, including their internet connections.  |                |
| Google Drive & Web site | Documents used in the creation and management of the charity's website <a href="https://www.prisonersofwarmuseum.com/">https://www.prisonersofwarmuseum.com/</a> are held in a Google drive. Access is limited to the charity's volunteers and is password protected at the folder level. Volunteers who access this do so on password protected equipment, including their internet connections   |                |
| Wordpress Website       | . <a href="https://www.prisonersofwarmuseum.com/">https://www.prisonersofwarmuseum.com/</a> is built using Wordpress which has its own security measures. Access to the content is controlled by user name and password. The website contains the names, but no other details, of people who have contributed content. A small number of email addresses are included where individuals have authorised it e.g. a commercial researcher. |                |
| Email & WhatsApp        | A number of personal email and WhatsApp accounts process personal information e.g. email addresses.  |                |

**See also our Web Page Privacy Policy - Link:**

<https://www.prisonersofwarmuseum.com/privacy-policy-2/>