

Compass Video Limited Data Management Policy

Introduction

Compass Video Limited needs to gather and use certain information about individuals. This can include clients, 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 organisation's data protection standards and to comply with the law.

This data management policy ensures Compass Video Limited:

- complies with data protection law and follows good practice
- protects the rights of clients, staff and partners
- is transparent about how it stores and processes individuals' data
- protects itself from the risks of a data breach

Data protection law

The UK General Data Protection Regulation (GDPR) applies in the UK. It outlines that personal data must be:

1. Processed lawfully, fairly and in a transparent manner in relation to individuals.
2. 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 or statistical purposes shall not be considered to be incompatible with the initial purposes.
3. Adequate, relevant and limited to what's necessary in relation to the purposes for which they're processed.
4. Accurate and, where necessary, kept up to date.
5. Protected – every reasonable step must be taken to ensure that personal data that's inaccurate, having regard to the purposes for which they're processed, is erased or rectified without delay.
6. Kept in a form that permits identification of data subjects for no longer than is necessary, and for the purposes for which the personal data is processed (personal).
7. Stored for longer periods. For example, the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes. This will also be subject to implementation of the appropriate technical and organisational measures required by UK GDPR in order to safeguard the rights and freedoms of individuals.
8. Processed in a manner that ensures appropriate security of personal data. This includes protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

9. Managed by a controller responsible for, and be able to demonstrate, compliance with the principles.

People and responsibilities

Everyone at Compass Video Limited contributes to compliance with UK GDPR. The Director of the business understands the requirements and has accountability for the organisation to prioritise and support the implementation of compliance. The Director will;

1. Document, maintain and develop the organisation's data protection policy and related procedures, in line with agreed schedule.
2. Sharing the policy across the organisation, and arranging training and advice for staff.
3. Dealing with subject access requests, deletion requests and queries from clients, stakeholders and data subjects about data protection related matters.
4. Checking and approving contracts or agreements with third parties that may handle the organisation's sensitive data.
5. Ensuring all systems, services and equipment used for storing data meet acceptable security standards.
6. Performing regular checks and scans to ensure security hardware and software are functioning properly.
7. Developing privacy notices to reflect a lawful basis for fair processing, ensuring that intended uses are clearly articulated. This will also ensure that data subjects understand how they can give or withdraw consent, or exercise their rights in relation to the company's use of their data.
8. Ensuring that audience development, marketing, fundraising and all other initiatives involving processing personal information and/or contacting individuals abide by the UK GDPR principles.

Data Protection Officer (DPO), the person responsible for fulfilling the tasks of the DPO in respect of Compass Video Limited, is Keith Seward - Director.

Under UK GDPR organisations in certain circumstances are required to appoint a DPO. However, regardless of whether the UK GDPR requires a DPO, you must ensure that your organisation has sufficient staff and skills to carry out your requirements under the UK GDPR.

Best practice dictates that, regardless of individual circumstances, organisations should appoint a named individual as DPO to lead on ensuring that data protection requirements are met. The minimum tasks of the DPO are to:

- inform and advise the organisation and its employees about their obligations to comply with UK GDPR and other data protection laws

- monitor compliance with UK GDPR and other data protection laws – including managing internal data protection activities, advising on data protection impact assessments, training staff and conducting internal audits
- be the first point of contact for supervisory authorities and for individuals whose data is processed (employees, clients)

Scope of personal information to be processed

Compass Video is a video production company and will film and photograph individuals for use in clients project. When filming information is captured from individuals to know who they are, permission for their likeness to be used and how to contact them.

The names, addresses, email addresses, phone numbers that are collected this way are stored in paper form in folders for the duration of the use of the content that the individual was captured in.

Consent

Compass Video requires that individuals who are filmed or photographed for client projects, complete the Compass Video Photo / Video release form. This form asks individuals to give permission for the use of their likeness for the clients project.

Data Sharing

Individuals have the opportunity to agree for their contact email address to be used to be contacted about updates from Compass Video. This email address is stored on a CRM system, currently we use Mail Chimp. This account is protected by MFA and strong passwords.

Security measures

Compass Video takes adequate security measures and these are outlined in the Compass Video Compass Video Limited Security Policy.

Subject access requests

Individuals are entitled to:

- ask what information Compass Video hold about them and why
- ask how to gain access to it
- be informed how to keep it up to date
- be informed how Compass Video is meeting its data protection obligations

Compass Video meta tag all digital assets. Should an individual request to know what assets we have of them, we can supply watermarked copies of content for them to view. These can be deleted upon request.

The right to be forgotten

Compass Video adheres to any right to be forgotten notice. Compass Video would ensure all assets attributed to an individual request are deleted or edited to remove the likeness of the individual.

Privacy notices

Compass Video Limited aims to ensure that individuals are aware that their data is being processed, and that they understand:

- who is processing their data
- what data is involved
- the purpose for processing that data
- the outcomes of data processing
- how to exercise their rights

The company has a privacy statement, setting out how data relating to these individuals is used by the company. <https://www.compass-video.com/privacy-policy/>

Ongoing documentation of measures to ensure compliance

Meeting the obligations of the UK GDPR to ensure compliance will be an ongoing process. Compass Video Limited will maintain documentation/evidence of the privacy measures implemented and records of compliance

Review of this document: annually by Keith Seward - Director

Next review date: 1st April 2025