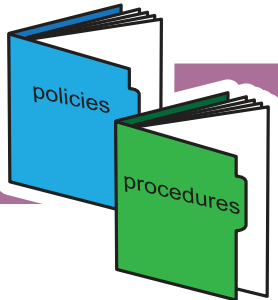


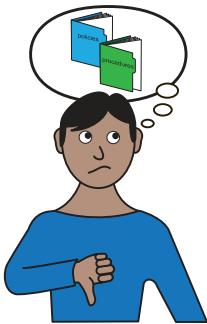


policies and procedures

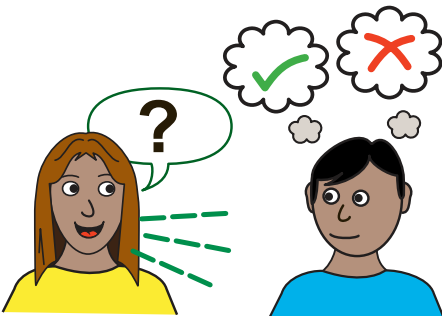


Our 'policies and procedures' are the rules about how we do things at Pyramid.

Following our policies and procedures helps to keep everybody safe.

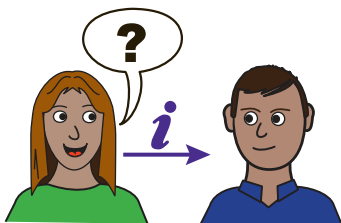


The policies and procedures also tell us what to do if something goes wrong.

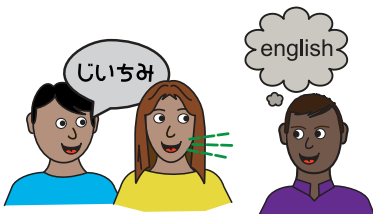


It is important that everybody at Pyramid can access and understand our policies and procedures.

The office team can help with this.



Please contact us if you would like support to read or understand this policy.



We can meet with you to talk about it. Or we can provide information in different format / language to suit your needs.



phone: **0113 234 6040**  
text: **07531 215 999**  
email: **governance@pyramid.org.uk**

## Data Protection Policy

Pyramid is committed to making sure that all personal information is handled in a responsible and secure way that protects individual rights and privacy.

|  |   |              |              |                           |               |
|--|---|--------------|--------------|---------------------------|---------------|
| Key terms / words                          | Please use the <b>glossary of policy terms</b> for definitions of key terms used in our policies and procedures.  |              |              |                           |               |
| Clarifications                             | The term ‘worker’ is used in this policy to refer to anyone doing work for Pyramid, in any capacity, whether paid or voluntary.   |              |              |                           |               |
| Who does this policy / procedure apply to? | Everyone.   |              |              |                           |               |
| Related policies and procedures            | Privacy Statement   |              |              |                           |               |
| Who is responsible for this document?      | <p>The Operations Manager is responsible for making sure that this document is kept up-to-date with accurate information, and that it is made available to anyone who wants to read it.</p> <p>The Board of Trustees have a legal responsibility to ensure that Pyramid has appropriate policies and procedures in place.</p> |              |              |                           |               |
| When was this document last checked?       | <p>The Trustees review all Pyramid policies and procedures on a rolling basis, and more often as required (for example, if there is a change in the law, or an incident review).</p> <p>This document was last checked by the Trustees on 11 September 2023.</p>  |              |              |                           |               |
| Who to contact                             | <p>If you have a question about this policy, or need support to understand it, please contact the Operations Manager.</p> <table border="0"> <tr> <td><b>Email</b></td> <td><b>Phone</b></td> </tr> <tr> <td>governance@pyramid.org.uk</td> <td>0113 234 6040</td> </tr> </table>   | <b>Email</b> | <b>Phone</b> | governance@pyramid.org.uk | 0113 234 6040 |
| <b>Email</b>                               | <b>Phone</b>  |              |              |                           |               |
| governance@pyramid.org.uk                  | 0113 234 6040   |              |              |                           |               |

## Introduction

Pyramid is a **data controller**. This means it holds personal information (**data**) about individuals.

Pyramid is a data controller because we need to store and share personal information about individuals in order to ensure safety and effective communication, and for monitoring purposes.

The people we store information about are called **data subjects** (e.g. members, volunteers, staff).

The law says what we can and can't do with personal information. It also gives individuals the right to control how their personal information is used.

The ways in which data is stored and used by Pyramid is explained in the **Privacy Statement**.

## What Pyramid must do to look after your data

The law says that all the personal data we hold must be:

### 1. Fairly and lawfully processed

We make sure we follow the law and our own policies when we process personal data.

### 2. Obtained and processed for limited purpose

We only ask for and keep data which is needed:

- to safely and effectively run Pyramid activities
- for monitoring purposes to ensure we are meeting our responsibilities in terms of Equal Opportunities
- to produce anonymous statistical information about our organisation for the purpose of attracting funding or reporting to current funders

### 3. Adequate, relevant and not excessive

We make sure that we maintain the balance of having enough information to safely and effectively operate, without asking for more than we need.

#### **4. Accurate**

We will do our best to ensure that all data recorded is accurate. If you tell us that something is wrong or has changed, we will correct it as soon as possible and always within the legal limit of 28 days.

#### **5. Not kept longer than necessary**

We keep personal data for everyone who is active in our organisation.

We review the data we hold every year, and securely delete data which has passed its retention period.

See the **Privacy Statement** for further information on retention periods.

#### **6. Secure**

Data will be kept in a secure system whether on paper or digitised to the best of our ability at all times.

See the **Privacy Statement** for further information on data storage.

#### **7. Processed in accordance with the data subject's rights**

You have the right to see what information we hold about you, and in some circumstances to stop us from using it. Please see **your rights** below.

#### **8. Protected through appropriate technical and organisational measures**

We make sure we have rules and procedures to protect data. For example, by

- using lockable filing cabinets
- password-protecting computers and phones
- making sure workers understand their responsibilities
- having security procedures in place for processing data

#### **9. Not transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection.**

We will make sure that there is adequate protection in place if data is transferred. This may happen if Pyramid uses online services that are hosted in other countries.

More information about the online services we use can be found in the **Privacy Statement**.

## Your rights

You have the right

- to be told whether any personal data about you is being processed
- to be given a description of the personal data, the reason it is being processed, and if it will be given to any other organisations or people
- to be given a copy of the data and told where it came from
- to object to processing that is likely to cause (or is causing) damage or distress
- to prevent processing for direct marketing
- to object to decisions being taken by automated means
- to have inaccurate personal data corrected, and in certain circumstances blocked, erased or destroyed
- to claim compensation for damages if we break the law in how we manage your data

Please see our **Privacy Statement** for information on how to exercise your rights as a data subject.

## Who to contact

email: [governance@pyramid.org.uk](mailto:governance@pyramid.org.uk)

write to:       The Operations Manager  
                  Pyramid  
                  Unit 62 Barkston House  
                  Croydon Street  
                  Leeds LS11 9RT