



Argyll Fisheries Trust - Data Handling Policy

1. The Trust in pursuance of its charitable objects which include the protection and enhancement of fish and their habitats in the Argyll & Bute district, needs to process personal data. The Trust accepts that it is a **data controller** for the purposes of the **General Data Protection Regulation** and that it must comply with the following **six principles** for the handling of personal data: -

- fairly and lawfully processed
- processed for limited purposes
- adequate and relevant and limited to what is necessary
- accurate and where necessary up to date
- not kept in a way that people can be identified from it for longer than is necessary
- processed in a way that ensures appropriate security

2. The Trust's officer responsible for compliance with GDPR is Alan Kettle-White (Operations Director). He will maintain the Trust's databases in compliance with GDPR. The Trust will hold **four separate databases**:

- A **Public Task database** of data held necessary to uphold the Trust's statutory duties
- A **Contract database** with information required in fulfilment of those contracts
- A **Legitimate Interests database** held subject to satisfaction of a 'legitimate interests' Assessment (²LIA assessment);
- **Consent database**, all data held under consent of the data subjects.



3. The Trust will audit its information annually to ensure that its databases are compliant with the **six principles of GDPR**. In particular, the audit will ensure:

- that data is held in **compliance with the act**
- data held is **accurate**
- that no more data is held that is **necessary**
- that data will be held **only for so long as it is needed**.

After each annual audit the responsible officer will note that the audit has taken place and that he certifies the Trust's databases as being compliant with GDPR.

4. The Trust will ensure that all the data held is securely stored. This will apply to physical copies of data as well as computer-based data.

5. The Trust will respond within 28 days to any written request (including by e-mail) by a data subject for details of information held by the Trust on them.

6. The Trust will publish a Privacy notice on its website.

² The LIA assessment requires that the information officer before entering the data on the Legitimate Interests database satisfies himself that the Trust is pursuing a legitimate interest in so doing, that processing the data is necessary for that purpose and that he has considered whether there are any balancing personal issues that override the right of the Trust to process that data (for example where that individual has particular vulnerabilities).