

DATA PROTECTION POLICY STATEMENT

Revised August 2017

In order to carry out its proper business and organisation functions Northern Ireland Screen has to collect and use information about people with whom it works. These may include current, past and prospective employees, clients, funded organisations, suppliers and others with whom it communicates.

The following 8 Data Protection principles are at the core of the DPA and we can ensure we comply with the DPA by following them. The principles specify that personal data must be:

- fairly and lawfully processed;
- obtained for specified and lawful purposes;
- adequate, relevant and not excessive;
- accurate and up to date;
- not kept longer than necessary;
- processed in accordance with the rights of individuals;
- kept securely;
- not transferred to any other country without adequate protection in that other country.

These guidelines set out Northern Ireland Screen's procedures for dealing with and protecting personal data (including sensitive personal data) under the DPA.

What is personal data?

Personal data relates to anyone who can be identified from the data e.g. any one or more of their name, address, telephone number, personal email addresses, date of birth, bank and payroll details, next of kin, passport particulars etc.

Sensitive personal data requires extra care and except in limited circumstances can usually only be collected and used with the express consent of that person. Such information relates to an individual's racial or ethnic origin, political opinions, religious beliefs, trade union membership, physical or mental health matters, sexual orientation, alleged or actual criminal activity and criminal records.

Disclosure of Personal Information

As a company, we have access to or routinely acquire personal data and sensitive data in many forms. The form this information may take includes letters, correspondence, contracts, call sheets, unit lists, cast lists, medical records, invoices,



purchase orders, rushes with captions, bank statements, list of employees, employee references. The information can be in hard copy form or in electronic form.

You should only collect what you need, for example it may be reasonable to collect the name and contact details of possible contractors but it is very unlikely you would need information regarding their sexual history.

Policy Awareness

A copy of this policy statement will be given to all new members of staff and interested third parties. Existing staff and any relevant third parties will be advised of the policy which will be available on the Northern Ireland Screen website as will any subsequent revisions. All staff and relevant third parties are to be familiar with and comply with the policy at all times.

Northern Ireland Screen's Designated Data Controller

Northern Ireland Screen's Director of Finance and Corporate Services is responsible for ensuring compliance with the Data Protection Act and implementation of this policy on behalf of the Chief Executive Officer. Contact details for the Director of Finance and Corporate Services are: Linda Martin, Northern Ireland Screen, 3rd Floor Alfred House, 21 Alfred Street, Belfast BT2 8ED, T 028 9023 2444 E linda@northernirelandscreen.co.uk

Any queries relating to the interpretation or operation of this policy should be taken up in the first instance with the Director of Finance and Corporate Services.

Policy Responsibility

The CEO has specific responsibility for the effective implementation of this policy and each member of the Senior Management Team also has responsibilities to abide by and ensure adherence to the policy.

Any employee who considers that the policy has not been followed in respect of personal data about themselves should raise the matter with their Line Manager or Northern Ireland Screen's Director of Finance and Corporate Services in the first instance.

Subject Access

All individuals who are the subject of personal data held by Northern Ireland Screen are entitled to:

- Ask what information Northern Ireland Screen holds about them and why;
- Ask how to gain access to it;
- Be informed how to keep it up to date

- Be informed what Northern Ireland Screen is doing to comply with its obligations under the Data Protection Act 1998.

Use of information

- Only collect what you need.
- Check that any personal data that you provide is accurate and up-to-date;
- You can only use personal data for the purposes for which it was collected or given to you. (Unless you ask the person to sign a consent form where they expressly agree that it can be used to contact them for other purposes.)
- If it is not obvious why you are collecting the information you should tell the person why you are collecting it and what you are using it for and how it will be shared, and remind them that they are protected by the DPA.

Data Security

It is very important to protect personal data and make sure it is stored and disposed of securely. It is the responsibility of each member of staff to ensure that:

- Any personal data that they hold is securely stored and only accessible to those who are authorised or who need to access it for the purposes of their job;
- Personal data in hard copy must be disposed of in the Shredbank units in the office;
- Documents that contain personal, sensitive or financial data should be electronically stored either in a secure part of the server with the appropriate access limitations or within an encrypted or password protected folder.
- All hard copy documents containing sensitive data (or data which may cause harm if lost) must be locked away at night and when unattended.
- Sensitive data should not be left in the open or unattended on your desk or visible on your computer where it could be seen by guests if you are not there.
- Personal data must not be transferred to another country unless there is adequate data protection in that country.
- If you become aware of a breach of security or an unauthorised disclosure or loss/theft of data or documents, you should alert Linda Martin immediately. You should take immediate action to identify the potential harm to the person(s) concerned and take immediate steps to mitigate any harm/damage to that individual.

How long do we keep personal data?

At regular intervals we will review the personal data that we hold to assess what information should be retained and what should be securely destroyed.



The Rights of Access to Information

Northern Ireland Screen employees and any other subjects of personal data held by Northern Ireland Screen have the right to access any personal data about them that is kept on paper file, on computer hard drive or by any other means of storage. This right of access is subject to certain exemptions as set out in the Data Protection Act. Any person wishing to exercise their right of access should make a written request (including via e-mail) in the first instance to Northern Ireland Screen's Data Protection Controller, the Director of Finance and Corporate Services.

Northern Ireland Screen reserves the right to charge the maximum fee payable for each subject access request. Where personal details are inaccurate they can be amended on request.

Northern Ireland Screen aims to comply with requests for access to personal information as quickly as possible, but in any case will ensure that the information is provided within 40 days of receipt of the request. In the event of a delay, the reason for this delay will be explained in writing to the individual making the request.

Publication of Northern Ireland Screen Information

Information that is already in the public domain is exempt from the Data Protection Act. This will include, for example, information on staff contained within externally circulated publications such as the E-Zine and the Annual Report. Where an individual has good reason for wishing that these details remain confidential should contact the Data Protection Controller to advise them of these circumstances.

Subject Consent

The need to process data for normal purposes has been communicated to all data subjects. In the case of sensitive data, such as health, religion or gender, express consent to process the data must be obtained. Processing may be necessary to operate Northern Ireland Screen policies, such as Health and Safety and Equal Opportunities.