



**CAMBRIDGESHIRE
& PETERBOROUGH**
COMBINED AUTHORITY

DATA PROTECTION POLICY

1. Cambridgeshire and Peterborough Combined Authority ("CPCA") shall take all necessary steps to ensure that the personal data it holds about its customers, suppliers, employees and all other individuals is processed fairly and lawfully.
2. CPCA shall ensure that all relevant statutory requirements are complied with and that its internal data protection procedures are monitored regularly.
3. CPCA shall implement and comply with the eight Data Protection Principles contained in the Data Protection Act 1998 ("the Act") which promotes good conduct in relation to processing personal information.
4. These Principles are:
 - (1) Personal data shall be processed fairly and lawfully. Individuals will not be misled as to the uses to which CPCA will put the information given.
 - (2) Personal data shall be obtained only for one or more specified and lawful purposes and shall not be further processed in any manner incompatible with that purpose or those purposes. CPCA ensures that individuals whose data is processed will be informed as fully as possible about the purposes for which the information is being processed.
 - (3) Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which it is processed. The information obtained by CPCA will be sufficient to ensure accurate processing.
 - (4) Personal data shall be accurate and where necessary, kept up to date. Errors will be corrected as soon as discovered or notified.
 - (5) Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes. Data which is no longer required will be securely destroyed.
 - (6) Personal data shall be processed in accordance with the rights of data subjects outlined in the Act. CPCA will attempt to reply to subject access requests as quickly as possible and in all cases within the 40 day timeframe allowed by the Act.

- (7) Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss, destruction or damage. In particular, unauthorised staff and other individuals will be prevented from gaining access to personal information. Appropriate physical security will be in place with visitors being received and supervised at all times within CPCA's premises where information about individuals is stored.
- (8) Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.
5. CPCA shall ensure that the Information Commissioner's Office is informed of all its uses of personal information and will review and update those entries from time to time.
 6. CPCA shall take such measures as may be necessary to ensure the proper training, supervision and instruction of all relevant employees in matters concerning data protection and to provide any necessary information.
 7. CPCA shall consult with its employees periodically to ascertain what measures should be taken to increase awareness of data protection issues and to ensure that all necessary measures are in place to make this Policy effective.
 8. Where reasonable and practicable personal data shared with any partner, associate or other organisation shall be the subject either of a protocol or confidentiality agreement which will define the context and limits of the data exchange.
 9. CPCA's Legal Counsel & Monitoring Officer shall have overall responsibility for data protection issues within the organisation.
 10. CPCA will keep this Policy under review taking account of changes in legislation, advice from the Information Commissioner's Office, decisions of the Courts, changes in technology, experience in practice and relevant guidance from other representatives.

Policy Number	Insert policy number	Version Number	1
Date of Issue			
Reviewed by	Audit and Governance Committee	18 December 2017	
Approved by	Cambridgeshire and Peterborough Combined Authority	31 January 2018	

Approved by	Business Board		
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