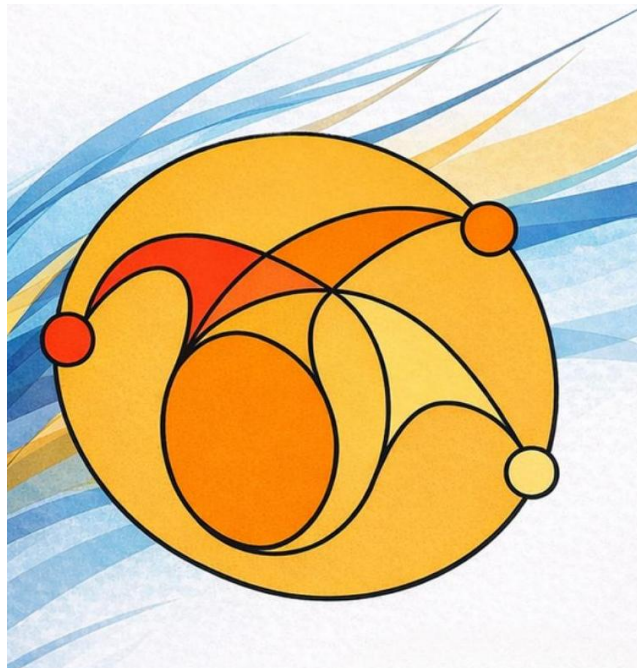


THE  
**PROVOCATIVE CHANGE**  
**WORKS**

**DATA PROTECTION AND ONLINE PRIVACY POLICY**





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# Data Protection and Online Privacy Policy

THE ASSOCIATION FOR PCW PRACTITIONERS

**Effective Date:** 01.04.2026

**Review Date:** 01.04.2027

**Version:** 1.0

## Introduction and Applicability

The Association for PCW Practitioners is committed to safeguarding personal data in line with all relevant legislation, which may be updated from time to time, and all relevant GDPR laws.

This policy outlines the principles, responsibilities, and procedures for processing personal data securely and transparently. This document serves as a guide for all members, contractors, and volunteers, ensuring that personal data is handled responsibly and in accordance with legal and organisational requirements.

## 1. Purpose and Scope

- ☐ The Association for PCW Practitioners is committed to safeguarding personal data and complying with GDPR and other data protection laws.
- ☐ This policy applies to all personal data processed by the Association and its members, regardless of the medium (digital or physical). It encompasses all activities carried out by the Association and its members, including data collection, storage, sharing, and disposal. This includes data collected through online platforms such as websites, email communication, and social media.



## Definitions

**Personal Data:** Any information relating to an identified or identifiable individual ("data subject"), such as names, contact details, or identification numbers.

**Sensitive Personal Data:** Special categories of personal data, such as racial or ethnic origin, health data, or religious beliefs.

**Processing:** Any operation performed on personal data, including collection, storage, use, or deletion.

**Data Subject:** An individual whose personal data is being processed.

**Data Controller:** The entity that determines the purposes and means of processing personal data.

**Data Processor:** The entity that processes data on behalf of the controller.

**Breach:** Any unauthorised or unlawful access, loss, or alteration of personal data.

## 2. Data Protection Principles

PCW practitioners must adhere to GDPR principles: lawfulness, fairness, transparency, purpose limitation, data minimisation, accuracy, storage limitation, integrity, confidentiality, and accountability.

The Association adheres to the following GDPR principles:

**Lawfulness, Fairness, and Transparency:** Personal data must be processed lawfully, fairly, and transparently in relation to the data subject.

**Purpose Limitation:** Data must be collected for specified, legitimate purposes and not further processed in ways incompatible with those purposes.

**Data Minimisation:** Only collect data that is adequate, relevant, and necessary for the intended purpose.

**Accuracy:** Ensure personal data is accurate and kept up to date.

**Storage Limitation:** Retain data only for as long as necessary for the purposes for which it was collected.



**Integrity and Confidentiality:** Protect data against unauthorised or unlawful processing and accidental loss or damage.

**Accountability:** The Association must be able to demonstrate compliance with GDPR obligations.

### 3. Responsibilities

All PCW practitioners and members must:

- ☐ Understand GDPR principles and comply with this policy.
- ☐ Handle personal data responsibly in accordance with Association guidelines.
- ☐ Report any suspected data breaches immediately to the GDPR Advisor.

The Association's designated GDPR Advisor is responsible for overseeing compliance and responding to data protection concerns.

### 4. Data Processing Procedures

**Lawful Basis for Processing:** All data processing activities must have a lawful basis, such as consent, legal obligation, contract, or legitimate interests. Evidence of consent shall be retained, and revocation of consent shall be promptly reflected in the Association's systems.

**Data Minimisation:** The Association shall collect and retain only the data necessary for specific purposes. Periodic reviews will be conducted to remove unnecessary information securely.

**Accuracy:** Reasonable steps shall be taken to ensure data accuracy. Individuals are encouraged to update their personal information as needed.



**Storage and Security:** Personal data shall be stored securely in locked cabinets or password-protected digital systems. Access shall be restricted to authorised personnel only. Security measures shall be regularly reviewed and updated.

**Retention and Disposal:** Personal data shall be retained for a period of 5–7 years after the relevant event or in accordance with the Association’s retention schedule. Data no longer required shall be securely disposed of.

## 5. Online Data Collection and Security

The Association collects personal data through its website and other online platforms for purposes such as membership registration, enquiries, and newsletter subscriptions.

**Cookies and Tracking:** Visitors will be informed about the use of cookies and tracking tools, with the option to consent.

**GDPR Compliance:** Personal data collected online will be processed in compliance with GDPR and applicable online privacy laws, such as the ePrivacy Directive.

**Secure Digital Systems:** All personal data collected online will be stored in encrypted systems meeting modern cybersecurity standards. Firewalls, anti-virus software, and regular security updates shall be utilised to protect online systems.

**Email and Communication:** The Association shall ensure that digital communications, including marketing updates, are sent only to individuals who have opted in. All emails shall include clear options for unsubscribing.

**Protection Against Online Breaches:** The Association shall employ robust measures to prevent unauthorised access, hacking, phishing, or other malicious activities.

## 6. Breach Reporting and Management

In the event of a data breach:

- ☐ Breaches must be reported immediately to the GDPR Advisor.



- ☐ Risks to the affected individual's rights and freedoms shall be assessed.
- ☐ Affected individuals and authorities (e.g., ICO) are notified within 72 hours if required.
- ☐ Breach details and corrective actions are documented.

## 7. Data Subject Rights

Individuals can request access, rectification, or deletion of their personal data, with requests addressed within 30 days.

## 8. Training and Awareness

Regular GDPR compliance and online privacy training should be undertaken by all members of the Association for PCW Practitioners, and a log of this training should be available on request.

## 9. Review and Monitoring

The policy is reviewed annually to ensure alignment with GDPR requirements, best practices, and evolving online privacy standards. Any updates or amendments to this policy will be communicated to all members, contractors, and volunteers in a timely manner.

## Contact Information

For any questions, concerns, or data subject requests, please contact:

**GDPR Advisor:** [GDPR Advisor Name and Contact Email]

**Supervisory Authority (UK):** Information Commissioner's Office (ICO) – [ico.org.uk](https://ico.org.uk)



## Acknowledgement

By continuing to work with or be a part of the Association, all members, contractors, and volunteers acknowledge their responsibility to comply with this policy. It is expected that all individuals covered by this policy familiarise themselves with its content and adhere to its requirements.