



## **GDPR and Data Protection Act Compliance Statement**

The EU General Data Protection Regulation is the new harmonising legislation which comes into force on 25 May 2018. In addition, the UK enactment of this regulation will be law; the Data Protection Act 2018.

The Corporation of The Hall of Arts And Sciences (the Royal Albert Hall) and its associated organisations are committed to ensuring that the security and confidentiality of personal data within our control and which we process, conforms to the law and we acknowledge the accountability principles enshrined in data protection legislation.

We have always ensured that we comply with data protection principles and operate within the law, and this will not change with the advent of new and enhanced legislation.

In response to the changes we have implemented a programme to review, audit and change our ways of handling personal data to ensure continued compliance, using a risk-based approach and always with the aim of maintaining robust systems and processes.

Our revised privacy policy, available on our website, describes how we will ensure the privacy and confidentiality of personal information and provide explanations as to the rights and freedoms that individuals enjoy in respect of their personal data.

A number of activities have taken place within the Royal Albert Hall to build on our already consistent and robust application of data protection requirements. These include:

- Data Protection Audit and Review – this has been carried out to identify personal data used and to understand gaps in processes, refine and improve documentation and identify risks;
- Policies and Procedures – have been reviewed and changed to comply with new requirements. These include:
  - Data Protection Policies and procedures
  - Data retention and disposal
  - Breach policy and process
  - Transfers of data
  - Subject Access Requests;
- Legal bases for processing – the processing of information has been reviewed to ensure a defined legal basis which is appropriate and provides assurances relating to “records of processing” activities, where applicable;
- Privacy Notice/Policy – a revised public facing privacy notice has been drafted and is available on our website;
- Direct Marketing – our basis for direct marketing, consents and permissions along with management of these have been reviewed to ensure that they are fit for purpose under the new legislation;
- Data Protection Impact Assessments – these are being introduced to ensure that all programmes of work where personal data are collected and processed are properly risk assessed and responsibility for compliance with the law is assigned appropriately and risks are managed accordingly;



- Contracts and Agreements – contracts with third parties, partners and data processors are being reviewed to ensure they are suitable for the future transfer of personal data. Where there is risk, this is being addressed by working with organisations to ensure the correct controls are in place and agreement/contracts revised where necessary;
- Special Category Data (sensitive personal data) – any collection of personal data which is classed as special category data will be protected accordingly with suitable technological and management controls and will not be used for purposes other than those for which they were collected. Where these are shared, we will ensure that third parties provide suitable assurances before transfers take place;
- Data Subject Rights – we take the rights of our visitors, customers and members extremely seriously. We highlight their rights and freedoms in our privacy notice which informs them of what data we hold, the purposes we hold it for, any sharing that may take place and the storage and management of their personal data. We provide contact details so that anyone with concerns or further questions can obtain more information, make a complaint or request their information.
- Organisational and technical measures – the new legislation calls out the need for appropriate organisational and technical measures, referring to “state of the art” and we take every reasonable measure to protect the information in our care and under our control. Such controls may include:
  - Secure websites;
  - Encryption to approved standards;
  - Minimum password and security requirements to access systems;
  - Authentication mechanisms to prevent unauthorised access;
  - and other controls as deemed necessary and appropriate for the risks.
- Staff/Employee Awareness – staff and employees are undergoing continual awareness training and will be trained and educated appropriately for the roles they undertake. Training will be cyclical, with a continual update and review for staff to ensure continued awareness and understanding.
- Privacy Team – a privacy team exists to ensure that the organisation is up-to-date with current interpretation of the law and to whom staff can refer with questions.

We can assure anyone with an interest in how the Royal Albert Hall handles personal data that we take our data protection obligations with the utmost seriousness.

Further questions may be directed to [mydata@royalalberthall.com](mailto:mydata@royalalberthall.com)

**Updated: 15 May 2018**