



THE IMPERIAL COLLEGE DRAMATIC SOCIETY

Data Protection Policy

1 Data

DramSoc (“the society”), Imperial College Union (“ICU”), and Imperial College London (“the College”) have a responsibility to protect data under the UK Data Protection Act 1998. This policy aims to address exactly what data the society holds (a subset of data held by ICU, itself a subset of Data held by the College), and how it is handled and stored.

2 Personal Data

2.1 Definitions

The following definitions are taken to have their meaning as in the Data Protection Act 1998 (or any subsequent revision);

- Personal Data
- Data Controller
- Sensitive Personal Data

2.2 Data Controller

Within the Society this is defined *ex officio* as the Systems Administrator, or, in the event that the position is unfilled, the Technical Director of the society or their delegate. However in line with Imperial College London’s policy¹, this is also jointly the Data Controller for the College and the Data Protection Co-Ordinator for ICU.

2.3 Information we hold

2.3.1 Introduction

DramSoc holds a wealth of data, some structured (such as information on current events including Quotes and Hire Agreements), and some unstructured (such as a Wiki).

¹<http://www.imperial.ac.uk/admin-services/legal-services-office/data-protection/our-policy/> [Retrieved 22nd November 2016]

2.3.2 Personal Data

DramSoc holds personal data for the purpose of managing;

- Members of the society
- Clients
- Events

These data may include names, email addresses, CID² Number and information about crew wages such as amounts paid and owed.

2.3.3 Sensitive Personal Data

The society does not hold any sensitive personal data within the meaning of the Data Protection Act 1998.

2.4 Handling of Data

2.4.1 Data

Data stored by the society will be stored in one or more computer systems, which may include:

- databases
- email accounts
- file servers

The data are accessed via various software applications. The applications will enforce appropriate data access restrictions. Direct access to the database will be limited to those members of the society strictly necessary to use the data as intended; ordinarily this will be restricted to the Data Controller of the Society, the DramSoc Technical Director, the Data Protection Co-ordinator of ICU and/or those with delegated responsibilities from the ICU Data Co-ordinator (usually the ICU Systems team). Additionally, the Union Sysadmin(s) will have access as per the ICU Web Policy³, section 5.3.3.a. The Systems Administrator of the society will have the responsibility of ensuring the confidentiality, integrity and accessibility of the data (together, the security of the data).

Society email accounts may contain unstructured data. Some of this data will be personally identifiable due to the nature of email. It will be for the owner of the email account to ensure that it is kept securely, and the Systems Administrator will be responsible for overseeing this security. Email accounts will not, in general, have access granted to the Systems Administrator, ICU or the College unless specifically requested (for example: to investigate a complaint, or as per the ICU Web Policy).

²College Identifier; the number assigned by the Imperial College of Science, Technology and Medicine ("Imperial College London") to individual staff, students, contractors and other persons.

³as enacted on 18th June 2015

3 Relationship to Imperial College Union

3.1 Data Controller

The society is a part of (**not** a subsidiary of) ICU. The responsibilities of Data Controller for the society are delegated from and overseen by the ICU Data Protection Co-ordinator.

3.2 Policies

The society will endeavour to ensure that this policy and future versions will be compatible with any ICU Data Protection Policies. Such policies will supersede this policy if there is any disagreement between the two.

4 Relationship to Imperial College

4.1 Policy change requirements

ICU is not currently a Data Controller. The College is the Data Controller for both itself and ICU. Therefore DramSoc's, and ICU's policies on Data Protection should be considered inferior to the College Policy. If there is ever a disagreement between the two, the superior College policy will take precedence over both DramSoc and ICU policies.