



# RVC DATA PROTECTION POLICY

## POLICY and PROCEDURES

Responsibility of	Data Protection Officer
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## 1) Policy Statement

The Royal Veterinary College holds and processes information about employees, students, clients, suppliers and other **Data Subject**s for various academic, administrative and commercial purposes. The College is committed to protecting the rights and freedoms of all our **Data Subject**s and to processing their data securely in accordance with our legal obligations.

The RVC will process data in accordance with the six Data Protection Principles, having established and documented a lawful basis for data processing together with an additional condition when processing any **Special Category Data**.

The RVC will not process data in ways that have an unjustifiably adverse effect on the **Data Subjects** and only handle data fairly and in ways that **Data Subjects** would reasonably expect.

The RVC will implement appropriate technical and organisational measures to ensure and be able to demonstrate that processing is undertaken in accordance with its legal obligations.

The RVC recognizes that data subjects have specific rights relating to the collection and use of their personal data and will ensure that it complies with these individual rights.

The RVC will ensure that it remains in compliance with current UK Data Protection law.

## 2) Key definitions

General Data Protection Regulat



Under delegated authority from the College Executive Committee, the responsibility for monitoring compliance with the GDPR / current UK Data Protection law, our data protection policy, awareness-raising, training, and audits will rest with the **Data Protection Office(DPO)**.

The College Executive Committee will ensure that:

- x it involves the **DPO** in a timely manner, in all issues relating to the protection of **PersonalData**
- x the **DPOs** sufficiently well resourced to be able to perform their tasksD



- x accurate and, where necessary, kept up to date
- x kept in a form that permits identification of **Data Subjects** for no longer than is necessary for the stated purposes for processing the data
- x protected against unauthorized or unlawful processing.

## 12) Security

All **Personal Data** must be processed in a manner that ensures its security. This must include protection against unauthorized or unlawful processing and against accidental loss, destruction or damage. Appropriate technical and organizational security measures must be employed.

## 13) Privacy Notices

The term **Personal Data** includes any information relating to an identified or identifiable natural person (Data Subject) whose identity can be identified, directly or indirectly, by reference to any information in possession of, or accessible to, the controller.



2) Contract



The choice of lawful basis for data processing does not dictate which special category condition is applicable.

The choice of the specific condition for processing **Special Category Data** must be made in consultation with the **DPO** and, in order demonstrate compliance, all decisions must be fully documented.

The requirements for processing **Special Category Data** are shown in Appendix 2.

## 21) Criminal Offence Data

**Personal Data** relating to criminal convictions and offences or related security matters must only be processed by anyone responsible for processing data when they are acting in an official capacity or

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If the breach is likely to result in a high risk of adversely affecting individual's rights and freedoms, the Data Subject(s) concerned must also be advised without due delay.

The DPO will facilitate the decision-



## APPENDIX 2 - Requirements for Special Category Data