



## Curious Motion CIC – Data Protection Policy

### OVERVIEW

Curious Motion is committed to protecting the privacy of everyone involved in our work. This policy helps us to demonstrate how we seek to comply with data protection legislation and be accountable for our actions.

This policy applies to all staff, freelancers, volunteers and contractors who process personal data on behalf of Curious Motion CIC.

It is our desire that employees, volunteers, and freelancers recognise the risks involved when dealing with such information and fully understand the steps that must be taken to minimise such risks. It is Curious Motion's policy to educate and inform employees, volunteers, and freelancers about the dangers of inappropriate and illegal use of the personal data they may have access to.

**To help protect people's personal data all staff and volunteers must adhere to the following:**

### GENERAL

- Always treat people's personal information with integrity and confidentiality.
- Know what the data protection principles are and apply them.

### DEVICES & ACCESS

- Make sure your devices (computer, mobile phone etc) are password protected.
- Passwords should be strong and changed regularly.
- If you access emails on your phone, this must have a security measure in place (e.g. face or touch ID).
- If possible, enable remote data wiping if your device is lost or stolen.
- Lock your phone when you aren't using it.
- Ensure your password is enabled/ device is locked whenever you're away from your screen.
- Use your own device, don't download or access sensitive data on other people's devices.
- Close down documents when you are not working on them.
- Use secure, not public wi-fi for all sensitive data.
- Be aware of where you are accessing sensitive data – for example, if you're in a public place can someone read your screen?
- Report losses of data or devices as soon as possible to the Data Protection Lead (DPL).

### COMMUNICATIONS

- Where applicable, use your Curious Motion email address for correspondence, rather than your personal email address.
- Be alert to cyber-attacks and report suspicious emails or calls.
- Take care to use the 'bcc' option for bulk emailing to ensure contact details are not shared.
- Beware of autocomplete on email. Check you are sending to the right address.
- If in doubt speak to the DPL first.

### STORING/ DELETING DATA



## Curious Motion CIC – Data Protection Policy

- Any sensitive data that you have accessed and downloaded to your device must be fully deleted after use – make sure to empty your trash.
- Don't print documents unless absolutely necessary, and cross-shred after use.

### INTRODUCTION

The security and management of data is important to ensure that we can function effectively and successfully for the benefit of our participants, team and for the wider community.

It is essential that people's privacy is protected through the lawful and appropriate use and handling of their personal information, in line with the UK General Data Protection Regulation (UK GDPR).

Curious Motion CIC is a data controller under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Every member of Curious Motion's team, including staff, freelancers and volunteers has a responsibility to adhere to the Data Protection Principles outlined in the UK GDPR, and to this Data Protection Policy.

Due to the size and nature of the organisation, Curious Motion is not required to appoint a statutory Data Protection Officer. Day-to-day responsibility for data protection is delegated to a named Data Protection Lead.

If you have a question about this Data Protection Policy or an area of concern about data protection matters, please contact our Data Protection Lead (DPL). The DPL is **Samantha McCormick**.

### DATA & LEGAL BASIS

We are committed to upholding the Data Protection Principles of the UK GDPR. All personal data under our control must be processed in accordance with these principles.

Curious Motion processes personal data using the following lawful bases:

- Consent – for mailing lists, images, wellbeing information and optional data
- Legitimate interests – to plan, deliver and evaluate our activities and meet funder reporting requirements
- Legal obligation – including safeguarding, financial records and insurance requirements

This meets UK GDPR expectations for small organisations.

Curious Motion may collect and process the following types of personal data:

- Names and contact details
- Emergency contact details
- Participation, attendance and evaluation data
- Equality, access and wellbeing information (voluntarily provided)
- Images, audio or video recordings (with consent)
- Staff, freelancer and volunteer records
- Safeguarding-related information where required by law



## Curious Motion CIC – Data Protection Policy

### DATA MINIMISATION & CONTROL

Data collection processes will be regularly reviewed by the Board of Directors to ensure that personal data collected and processed is kept to a minimum.

We will keep the personal data that we collect, use and share to the minimum amount required to be adequate for its purpose.

Curious Motion retains personal data only for as long as necessary for the purpose for which it was collected. In most cases this will be for the duration of a project and a limited period afterwards to meet reporting, evaluation or legal requirements. For example:

- Mailing lists reviewed annually (subscribers can opt-out at any time)
- Financial records retained for 7 years
- Safeguarding records retained in line with legal guidance

In the case of sharing personal data with any third party, only the data that is necessary to fulfil the purpose of sharing will be disclosed.

Anonymisation and pseudonymisation of personal data stored or transferred should be considered where doing so is a possibility.

### ACCOUNTABILITY

Overall responsibility for data protection rests with the Directors of Curious Motion CIC.

The Data Protection Lead is responsible for overseeing compliance, advising staff and freelancers, and managing data protection incidents.

Individual members of staff, freelancers, and volunteers have a duty to contribute to ensure that the measures outlined in this policy are accurately reflected in our practice.

Staff, freelancers and volunteers will be provided with appropriate guidance on data protection as part of induction and ongoing support.

### USE OF THIRD PARTY SERVICES

Curious Motion uses third party services to process some data, for example we store and manage our data via Google Workspace (Drive, Mail, etc).

In all cases, Curious Motion must only appoint third party processors who can provide sufficient guarantees around compliance with the UK GDPR and that the rights of data subjects will be protected.

Where a processor can demonstrate that they adhere to approved codes of conduct or certification schemes, this should be taken into consideration for choice of supplier.



## Curious Motion CIC – Data Protection Policy

Where Curious Motion uses a processor, a written contract with compulsory terms as set out in Article 28 of the UK GDPR must be in place (plus any additional requirements that we determine). Processors can only act on the instruction of Curious Motion.

### RIGHTS OF DATA SUBJECTS

Under data protection laws, data subjects have certain rights:

- **Right to be informed.** The right to be told how their personal data is used in clear and transparent language.
- **Right of access.** The right to know and have access to the personal data we hold about them.
- **Right to data portability.** The right to receive their data in a common and machine-readable electronic format.
- **Right to be forgotten.** The right to have their personal data erased.
- **Right to rectification.** The right to have their personal data corrected where it is inaccurate or incomplete.
- **Right to object.** The right to complain and to object to processing.
- **Right to purpose limitation.** The right to limit the extent of the processing of their personal data.
- **Rights related to automated decision-making and profiling.** The right not to be subject to decisions without human involvement.

We will uphold individuals' rights under data protection laws and allow them to exercise their rights over the personal data we hold about them. Privacy information will acknowledge these rights and explain how individuals can exercise them. Most rights are not absolute, and the individual will be able to exercise them depending on the circumstances, and exemptions may apply in some cases.

Any request in respect of these rights should preferably be made in writing to [hello@curiousmotion.org.uk](mailto:hello@curiousmotion.org.uk), but we will also accept verbal requests.

There is no fee for facilitating a request, unless it is 'manifestly unfounded or excessive', in which case administrative costs can be recovered.

Requests that are 'manifestly unfounded or excessive' can be refused.

We will take reasonable measures to require individuals to prove their identity where it is not obvious that they are the data subject.

We will respond to the request within one month from the date of request or being able to identify the person, unless it is particularly complex (in which case we will respond in no longer than 90 days).

The DPO will ensure that required actions are taken and that the appropriate response is facilitated within the deadline.

The DPO will draw up procedures for responding to requests where necessary, for example, for facilitating Subject Access Requests.

### REPORTING OF BREACHES

Curious Motion CIC | [www.curiousmotion.org.uk](http://www.curiousmotion.org.uk)  
Registered office address: Resource Centre, Hall Street, Halifax. HX1 5AY  
CIC No. 12356173



## Curious Motion CIC – Data Protection Policy

If actual or suspected personal data breaches must be reported immediately to the Data Protection Lead.

Where a breach is likely to result in a risk to individuals' rights and freedoms, it will be reported to the Information Commissioner's Office within 72 hours.

Serious breaches may also be reported to affected individuals where required.

### REVIEW

Last review and approval: January 2026

Next review due: January 2027