

The Babraham Institute

BI-IM-002 DATA PROTECTION POLICY

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Please tick one box for each group.			
Group Name	Mandatory	Group Name	Mandatory
All Users	<input checked="" type="checkbox"/>	Heads of Department	<input type="checkbox"/>
Trustees	<input type="checkbox"/>	BCE Staff	<input type="checkbox"/>
Researcher (Wet)	<input type="checkbox"/>	Nursery	<input type="checkbox"/>
Researcher (Dry)	<input type="checkbox"/>	Visitors	<input type="checkbox"/>
BSU Staff	<input type="checkbox"/>	Credit Card Users	<input type="checkbox"/>
BSU Users	<input type="checkbox"/>	Ionising Radiation Users	<input type="checkbox"/>
Notes: Optional for Trustees			

Associated policies, procedures and guidance
<p>This policy should be read in conjunction with:</p> <p>BI-IM-002-SOP-001 Data Breach Procedure</p> <p>BI-IM-002-SOP-002 Data Subject Rights Request Procedure</p> <p>BI-IM-003-SOP-003 Personal Data Consent Procedure</p> <p>BI-BICS-001 IT Security and Usage Policy</p> <p>BI-BICS-002 Bring Your Own Device Policy</p> <p>GDPR and Data Protection Pages on The Hub</p> <p>Babraham Institute Privacy Policy</p> <p>BI-RES-006 Records Retention Policy</p> <p>Data Protection Impact Assessment (DPIA) 3(o)-5(n)-5(al)11()-2(Data)-3()-2(C)4(o)-5(n)-5(s)3(en)-7</p>

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1. Definitions

) #	The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the Processing of Personal Data.
) h \	The senior manager who is responsible for ensuring that an organisation follows its data protection policy and complies with the Data Protection Laws.
) h O	Includes the General Data Protection Regulation 2016/679; the UK Data Protection Act 2018 and all relevant EU and UK data protection legislation.
) o o y	The individual whose personal information is being held or processed by the Babraham Institute (e.g., a service user or a supporter).
Explicit Consent	A freely given, specific and informed agreement by a Data Subject (see definition) to the processing of personal information about themselves7 G(in)16
V	Notifying the Information Commissioners Office (ICO) about the data processing activities of the Institute and subsidiary companies. Note: not for-profit organisations are exempt from notification but the Institute has registered with the ICO as we are not exempt from reporting data breaches.
@ # @\	The supervisory authority responsible for implementing, enforcing and overseeing the Data Protection Act 2018 and the GDPR in the UK.
Processing	Collecting, amending, handling, storing or disclosing personal information.
Processor	Means a natural or legal person, public authority, agency or other body that processes personal data on behalf of the controller.
h @ /	Information about living in

o	Employees and Babraham Institute registered PhD students.
Associates	Research Fellows (honorary), Honorary Members of Faculty, visiting students, visiting researchers and workers (including consultants and secondees), workers provided by a third party / contractors, and Trustees.
@	Staff, associates, visitors and members of the public.

2. Commitment statement

- 2.1. At the Babraham Institute our mission is to be an international leader in research focusing on basic cell and molecular biology with an emphasis on healthy ageing through the human life course.
- 2.2. Research and operational excellence are essential to meeting our vision of being at the forefront of research that improves lives. The [Institute Values](#) set out our approach to how we operate across all Institute activities, both at an individual level and together as the Babraham Institute. The expectation of the Institute is that each staff member looks to represent and reflect the Institute Values within their own contributions and function, and to support and not hinder the expression of these Values in the work of others.
- 2.3. We are committed to protecting the rights and privacy of individuals. We need to collect and use certain types of data in order to carry out our work. This personal information will be collected and dealt with in accordance with data protection laws. We are committed to being transparent regarding the collection and use of personal data and provide a privacy policy on the Babraham Institute website (see <https://www.babraham.ac.uk/legal/privacy-policy>)

3.3. Personal data may be held electronically or as a hard copy. It may be stored

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- The right of access (See section 6.5);
- The right to rectification;
- The right to erasure;
- The right to restrict processing;
- The right to data portability;
- The right to object; and
- The right not to be subject to automated decision-making, including profiling.

6.2.2. Individuals have a right to have personal data corrected if it is wrong, to prevent use which is causing them damage or distress, or to stop marketing information being sent to them.

6.2.3. The [Data Subject Rights Requests Procedure \(BI-IM-002-SOP-002\)](#) provides a framework for all staff to refer to when handling a data subject rights request.

6.3. Special category data

6.3.1.

6.3.6. If you are relying on the substantial public interest condition in Article 9(2)(g), you also need to meet one of 23 specific substantial public interest conditions set out in Part 2 of Schedule 1 of the DPA 2018. For more information, see ICO guidance [here](#).

6.4. Personal data breaches

6.4.1. A **personal** data breach is a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. This includes breaches that are the result of both accidental and deliberate causes.

6.4.2. The Institute will treat any ~~personal data~~ **personal data** breach very seriously and will fully investigate any such breach. Full records will be kept within the Institute's Data Breach Register and maintained by the CIO.

6.4.3. The GDPR imposes a duty on all organisations to report certain types of personal data breach to the relevant supervisory authority. This should be within 72 hours of becoming aware of the breach, where feasible. The Information Commissioner's Office (ICO) is the supervisory authority for the United Kingdom.

6.10.1.2. Remember, emails that contain personal i

- 6.10.5.1. Personal information and records relating to service users will be stored securely and will only be accessible to authorised staff and associates.
- 6.10.5.2. Personal information will be stored only for as long as necessary and will be disposed of appropriately when no longer necessary.
- 6.10.5.3. The Institute shall ensure any personal data and company data is unrecoverable from any computer system previously used within the Institute that has been passed on / sold to a third party.
- 6.10.5.4. This policy will be updated as necessary to reflect best practice in personal data management, security and control and to ensure compliance with any changes or amendments made to any data protection laws.

6.11. Freedom of Information Requests

- 6.11.1. The Freedom of Information Act 2000 was introduced to increase accountability of public bodies by enabling members of the public to request disclosure of information such as decision-making processes and internal practises. The Act does not apply to the Institute, but we are still required to respond to requests for information where information shared with a public body, e.g., as part of a tender or procurement contract, is subject to a Freedom of Information request. The information

