

Data Protection Policy

1. The UKTA is committed to protecting the Personal Data of its members and other stakeholders.
2. The purpose of this policy is to set out the UKTA's commitment to processing Personal Data in a lawful, fair and transparent manner. The UKTA aims to comply with relevant data protection regulations including the UK General Data Protection Regulation (GDPR).
3. The UKTA is a Data Controller under the provisions of the UK GDPR and Data Protection Act 2018 and has chosen to voluntarily register with the UK Information Commissioner's Office (ICO).

ICO Registration Number: ZC104049.

4. The UKTA will apply this policy to all Personal Data processed by the UKTA for its Data Subjects which includes members, potential members, third party organisations, suppliers and other stakeholders.
5. The UKTA will apply this policy to all data collected, stored, processed, transmitted, and deleted both electronically and on paper.

Principles of Data Protection

6. The UKTA adheres to the following key principles of data protection:
 - a. **Lawfulness, Fairness and Transparency:** Personal Data shall be processed lawfully, fairly and in a transparent manner.
 - b. **Purpose Limitation:** Personal Data shall be collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
 - c. **Data Minimisation:** Personal Data shall be adequate, relevant, and limited to what is necessary for the purposes for which it is processed.
 - d. **Accuracy:** Personal Data shall be accurate and, where necessary, kept up to date.
 - e. **Storage Limitation:** Personal Data shall be kept in a form that permits identification of Data Subjects for no longer than necessary for the purposes for which the data is processed.
 - f. **Integrity and Confidentiality:** Personal Data shall be processed in a manner that ensures appropriate security, including protection against unauthorized or unlawful processing, accidental loss, destruction, or damage, using appropriate technical and organizational measures.

- g. **Accountability:** The UKTA Committee shall be responsible for, and able to demonstrate, compliance with the above principles.

Personal Data

- 7. The UKTA will process Personal Data in accordance with its Privacy Notice and based on one or more of the following legal bases:
 - a. The Data Subject has given consent to the processing of their Personal Data.
 - b. Processing is necessary for the performance of a contract to which the Data Subject is a party.
 - c. Processing is necessary for compliance with a legal obligation.
 - d. Processing is necessary to protect the vital interests of the Data Subject or another person.
 - e. Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority.
 - f. Processing is necessary for the purposes of legitimate interests pursued by the UKTA or a third party, except where such interests are overridden by the rights and freedoms of the Data Subject.

Rights of a Data Subject

- 8. The UKTA recognises and respects the rights of Data Subjects, including:
 - a. The right to be informed about the collection and use of their Personal Data.
 - b. The right of access to their Personal Data.
 - c. The right to rectification of inaccurate or incomplete data.
 - d. The right to erasure ("right to be forgotten").
 - e. The right to restrict processing.
 - f. The right to data portability.
 - g. The right to object to processing.
 - h. Rights in relation to automated decision-making and profiling.
- 9. Data Subjects may exercise their rights by submitting a written request to the UKTA Secretary at secretary@ukta.org who acts as the Data Protection Officer (DPO) and Chair

(chair@ukta.org) and Deputy Chair (depchair@ukta.org). The UKTA will require two valid forms of identification for the purpose of verification.

10. In the unlikely event that the UKTA cannot comply with a request, it will explain its reasons.
11. The UKTA reserves the right to refuse or require reimbursement for requests that it considers unreasonable, or which require additional time or unreasonable expense.

Data Security

12. The UKTA is committed to ensuring the security of Personal Data through the implementation of appropriate technical and organisational measures, including where appropriate:
 - a. Encryption of sensitive Personal Data.
 - b. Access controls and user authentication.
 - c. Appropriate security audits and risk assessments.
 - d. Committee member awareness.
 - e. Procedures for reporting and responding to data breaches.

Data Breach Response

13. In the event of a data breach, the UKTA will promptly assess the situation and take appropriate action to mitigate the impact. If the breach is likely to result in a high risk to the rights and freedoms of individuals, the UKTA will notify the relevant supervisory authority and affected Data Subjects within the legally required time frame.

Data Retention and Disposal

14. The UKTA will retain Personal Data only for as long as necessary to fulfil the purposes for which it was collected and to comply with legal or regulatory requirements.
15. Personal Data that is no longer required will be held for no longer than 7 years after which it will be securely deleted or destroyed.

Third-Party Data Processors

16. Where the UKTA engages third-party processors to process Personal Data on its behalf, it will ensure that such processors comply with data protection regulations and implement appropriate safeguards to protect Personal Data.

Roles and Responsibilities

17. The UKTA Secretary acts as the Data Protection Officer (DPO) responsible for overseeing the UKTA's data protection strategy and ensuring compliance with applicable data protection laws. The UKTA Secretary, as DPO, will serve as the point of contact for Data Subjects and regulatory authorities.
18. All members are responsible for following the UKTA's data protection policy and procedures and for safeguarding Personal Data in their day-to-day activities. Members must report any data breaches or suspected breaches to the UKTA Secretary as DPO immediately.
19. All members of the UKTA Committee, including any appointed Press Officer and Membership Administrator, are responsible for ensuring that data protection is integrated into the UKTA's overall governance framework and that adequate resources are allocated to implement this policy.
20. Committee members, including any appointed Press Officer and Membership Administrator, must report any data breaches or suspected breaches to the UKTA Secretary as DPO, Chair and Deputy Chair immediately.

Training and Awareness

21. The UKTA Secretary will provide regular training and awareness to Committee members, including any appointed Press Officer and Membership Administrator, to ensure that Committee members understand their responsibilities under this policy and are equipped to handle Personal Data securely and in compliance with the law.

Review and Updates

22. The UKTA Secretary as DPO will ensure that the policy remains current and effective.
23. The UKTA Committee will review this policy annually.

Current Issued Revision: 1
Previous Revision: N/A

Signed: Jon Willis
Acting UKTA Chair

Date: 13 March, 2026

Signed: Catherine Simpson
UKTA Secretary

Date: 13 March, 2026