

Title	Data Protection Policy
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## 1. The Policy

- a. GDPR regulates the way in which all personal data is held and processed. This policy explains how we use any personal information collected in relation to our variety of stakeholders which include members, students, clients, partners, stakeholders, contractors and volunteers.
- b. In order to operate efficiently, Skillz Miner Ltd needs to collect and use information about the people with whom we work. This includes current, past and prospective employees, members, students, clients, partners, stakeholders, contractors and volunteers and others with whom we communicate.
- c. Skillz Miner Ltd regards the lawful and correct treatment of personal information as integral to our successful operation and to maintaining the confidence of the people we work with. To this end, we fully endorse and adhere to the principles of GDPR.

## 2. The Purpose

- a. The purpose of this policy is to ensure that everyone handling personal data at Skillz Miner Ltd is fully aware of the requirements and complies with data protection procedures and that data subjects are aware of their rights.
- b. 'Personal data' covered by GDPR is essentially any recorded information which identifies a living individual. Personal data held by Skillz Miner Ltd will include contact information for a variety of stakeholders and other personal details.

## 3. Policy Statement

### 3.1. The principles of GDPR require that personal information must:

- a. Be processed fairly and lawfully
- b. Not be used for any purpose, other than the purpose it was collected for
- c. Be adequate, relevant and not excessive for the purpose
- d. Be accurate and up to date
- e. Not be kept longer than necessary
- f. Be processed in accordance with the data subject's rights
- g. Be kept secure and protected from unauthorised processing, loss or destruction

3.2. In order to meet the requirements of the principles, Skillz Miner Ltd will:

- a. Fully observe conditions regarding the fair collection and use of information
- b. Meet its legal obligations to specify the purposes for which information is used
- c. Collect and process appropriate information, and only to the extent that it is needed to fulfil operational needs or to comply with any legal requirements
- d. Ensure the quality of the information used
- e. Hold personal information on Skillz Miner Ltd systems for as long as is necessary for the relevant purpose, or as long as is set out in any relevant contract held with the Company
- f. Ensure that the rights of people about whom information is held can be fully exercised under GDPR. These include: the right to be informed that processing is being undertaken, the data subject's right of access to their personal information, the right to prevent processing in certain circumstances, the right to correct, rectify, block or erase information which is regarded as wrong information
- g. Take appropriate technical and organisational security measures to safeguard personal
- h. information
- i. Ensure that personal information is not transferred outside the EEA without suitable safeguards

#### **4. Responsibility**

4.1. **Kirsty Mitchell, CEO** is the Data Protection Representative for Skillz Miner Ltd.

4.2. The Chief Executive has overall responsibility for compliance of GDPR but individual members of staff are responsible for the proper use of the data they process.

4.3. Skillz Miner Ltd will ensure that:

- a. All staff managing and handling personal information understand that they are responsible for following good data protection practice
- b. This policy is available to each member of staff
- c. All staff managing and handling personal information is appropriately trained and supervised
- d. Queries about handling personal information are promptly and courteously dealt with and clear information is available to all staff

4.4. Staff responsibility. All staff:

- a. Should be aware of the requirements of GDPR and how the rules apply to them
- b. Must complete data protection training requirements
- c. Have a responsibility to ensure that they respect confidential information in their possession and maintain information security. Disclosure of confidential information gained as part of your employment to a third party, or assisting others in disclosure, will be viewed by Skillz Miner Ltd in line with our disciplinary procedures
- d. All staff are responsible for ensuring personal information is kept no longer than is necessary

#### **5. Subject Access Requests**

- a. Under GDPR individuals have the right to access personal information that Skillz Miner Ltd may hold about them. If you wish to request such information or you receive a Subject Access Request from anyone, please contact the CEO Kirsty Mitchell.

Company Registration Number: SC594537

VAT Number: 308431522

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