

Union Jack Club

Privacy Impact Assessment

1. Scope

Union Jack Club's data processing activities will undergo an initial Privacy Impact Assessment ("PIA") and subsequent PIAs throughout its lifecycle.

A subsequent PIA may be carried out in the following circumstances:

- When setting up a new IT system;
- When new legislation, policies or related matters affecting privacy, are developed;
- When launching a data sharing initiative; and/or
- When personal data is used for new purposes.

2. Responsibilities

The Data Protection Officer ("DPO") is responsible for determining whether a full PIA is required. He or she shall reach this decision based on a PIA questionnaire, which must be undertaken for the purposes of making such a determination.

All completed PIAs will be signed off on behalf of the Board of Trustees by the Chief Executive Officer.

3. Process

The DPO shall at all times conduct PIAs by direct reference to the Information Commissioner's Office ("ICO") Code of Practice.

The DPO may seek specialist advice regarding privacy, should he or she feel it is required.

The DPO shall record all outcomes, including whether or not a PIA is required, in the ICO Code of Practice Annexes.

The DPO shall record in all change control processes that a PIA has been considered.

4. Document owner

The Data Controller is the owner of this policy document and must ensure that it is periodically reviewed according to the review requirements contained herein.

The latest version of this policy document dated 1st March 2018 is available to all members and guests of Union Jack Club on the Club's website or for staff on the Club's Internet and will be included in the Club's training program undertaken by Heads of Department.

This policy document was approved by Union Jack Club's Board of Trustees and is issued by the Chief Executive Officer ("CEO") on a version controlled basis.

Name of CEO: Mr Simon Atkins

Date: 1st March 2018

Change history record

Issue	Description of Change	Approval	Date of Issue
1	n/a	n/a	n/a
2	n/a	n/a	n/a
3	n/a	n/a	n/a