

Policy agreed: October 2025

Review date: October 2027

Introduction

The Independent Custody Visiting Association (ICVA) is a not-for-profit company limited by guarantee, incorporated in England and Wales. ICVA is committed to protecting the privacy and personal data of individuals in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Legal basis for processing

ICVA processes personal data under the following lawful bases as defined by UK GDPR:

- Consent: For newsletters, event registration, and feedback surveys.
- Contractual necessity: For employment and board member data.
- Legal obligation: For compliance with Companies House and financial regulations.
- Legitimate interests: For internal communications and operational purposes.

Data subject rights

Under UK GDPR, individuals have the following rights:

- Right to access
- Right to rectification
- Right to erasure (right to be forgotten)
- Right to restrict processing
- Right to data portability
- Right to object
- Right not to be subject to automated decision-making

To exercise these rights, contact ICVA via e-mail: info@icva.org.uk

Data collection and retention

ICVA collects and retains personal data including email addresses, emergency contacts, payroll information, and home addresses for specific purposes. Data is stored securely in Microsoft One Drive and retained for six years.

International data transfers

ICVA does not transfer personal data outside the UK. If international transfers are necessary, ICVA will ensure appropriate safeguards are in place, such as adequacy decisions or Standard Contractual Clauses (SCCs).

Security measures

All personal data is stored securely, and access is restricted to authorized personnel. ICVA uses One Drive with supervised access by the Chief Executive Officer.

Changes to this policy

ICVA may update this privacy policy periodically. Any changes will be communicated to members and published on the ICVA website.