

CONFIDENTIAL DATA - SAFEGUARDING STORAGE, USE, ACCESS AND SHARING

In order to comply with all current relevant legislation and good working practice applicable to organisations such as ours, in relation to safeguarding the use, storage, access and security of confidential company and service user/ personnel data, Cirk Hes Ltd has the following protocols

1. All confidential data is stored on the office PC 'HAPPY' on a separate internal disk (D) to our regular operational C drive disk. In a folder marked CIRK HES CONFIDENTIAL. Only the following personnel have authorised access to this additional drive.

Naomi Lewis – Charity Manager
Georgina Hopwood Bookkeeper and Treasurer
Ross Wheeler Admin and Neuro Diversity / CAAP lead
Rosemary Elizabeth Jolly Home Ed, Teens with complex needs and Safeguarding lead

All files in CH CONFIDENTIAL will be backed up once weekly by the Charity Manager, onto an external hard drive, that is kept locked in the office filing cabinet between uses. No sensitive information is stored on any cloud drives. Again only the above named personnel have access to this external back up drive.

This external hard drive is marked Cirk Hes back up and lives in the top drawer of the Bisley Drawers.

Access for the key to these drawers is limited to Naomi Ross, Rosi and Georgy.

In the near future Georgy will set up a private stand alone data server, for all our confidential data storage, marketing, business, community network, and data analysis needs. Until then this is an adequate temporary solution.

NOTE- CIRK HES LTD OPERATIVES AND PERSONNEL WILL NOT SHARE ANY INFORMATION WITH ANY ORGANISATION OR INDIVIDUAL WITHOUT THE EXPRESS CONSENT OF THE PERSON CONCERNED, OR THEIR NOMINATED ADVOCATE (IF THEY ARE UNABLE TO UNDERSTAND THE CONCEPT OF CONSENT, OR COGNITIVELY PROCESS AND COMMUNICATE SUCH CONSENT).

If consent to share data is obtained, it will only be shared on a 'need to know' basis by authorised parties, acting in the best interests of the individual whose data is to be shared.

Cirk Hes Ltd will not share, sell or disclose any data of the types governed by current GDPR, Safeguarding, Health & Safety legislation and good working practice guidelines, and to comply with our own organisation's policy, procedure and protocols.

USE OF AI TOOLS

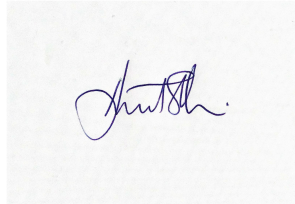
In relation to the use of AI Large Language Model tools such as CHATGPT, or other AI tools that the organisation may choose to use in future. ALL PERSONNEL MUST EXERCISE EXTREME CAUTION

DATA PROTECTION/ GDPR 1.2 - REF DATA PROTECTION – SAFEGUARDING – GOVERNANCE –
Reviewed 15/07/2026 by N Lewis ADMIN
Due for review unless a breach or incident requires it 17/09/2027

TO ENSURE THAT ANY DATA THAT IS CONFIDENTIAL IN NATURE IS **NEVER UPLOADED OR DISCLOSED** IN THE COURSE OF OUR WORK USING SUCH TOOLS.

IF IN DOUBT PERSONNEL MUST SEEK CLARIFICATION FIRST VIA OUR CHARITY MANAGER, OUR SEND LEAD, OR OUR CURRENT COMPANY SECRETARY.

Last reviewed and approved by the Board 18/09/2026

A handwritten signature in blue ink, appearing to read 'David Ellis', is centered within a light gray rectangular box.

Authorised by Sec/Trustee Mr David Ellis