

## Purpose

The purpose of this policy is to outline the World Nuclear Transport Institute's (WNTI's) framework for how we collect, store and use personal and commercially sensitive data fairly, securely and in compliance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

This applies to all personal and commercially sensitive data related to:

- Staff, secondees, and contractors
- Representatives of member organisations
- Individuals attending events
- Website users
- Commercial and operational data

Please note that WNTI reserves the right to change this policy at any time with reasonable notice.

## Scope

This policy applies to all WNTI board members, employees, secondees, representatives and external consultants, involved in our work. It covers:

- All data collected and processed by WNTI relating to members, event attendees, and external parties.
- All systems used to collect, store, and process personal data (digital and physical), particularly the WNTI Cloud.

## Policy Statements

WNTI is committed to safeguarding the privacy and data rights of all individuals and organisations we interact with.

### 1. Roles and Responsibilities

- **Data Controller:** WNTI is the data controller for all personal data it collects.
- **Data Processor:** Third-party service providers may act as processors on behalf of WNTI.
- **Staff, Secondees, and Contractors:** Must comply with this policy and report any data breach or concern immediately.

### 2. Legal Basis for Processing

WNTI process personal or commercial data under one or more of the following lawful bases:

- To fulfil a contract (e.g. event registration, employment)
- Legal obligation (e.g. tax or employment law)
- Legitimate interests (e.g. membership services)
- Consent (where required, such as for marketing emails)

### 3. Data Collection and Use

WNTI collects and process only the data we need to run our organisation effectively and meet legal requirements.

Categories of Personal and Commercial Data collected includes:

- **Member Organisations: contact** details of representatives, records of communications  
Event Attendees: name, organisation, contact, accessibility / dietary needs, attendance records
- **Website Users:** IP addresses, cookies (with consent)
- **Staff, Secondees and Contractors:** employment, contact, bank, performance
- **Commercial Data:** plans, contracts, IP and other sensitive material

#### 4. Data Storage and Retention

The majority of data is securely stored in the WNTI Cloud. Data is accessed only by authorised users and retained only as long as necessary. In general

- **Event Data:** up to 2 years
- **HR Data:** up to 6 years after leaving
- **Financial Records:** 7 years
- **Membership Data:** while active and for 6 years after end of membership

#### 5. Data Sharing

WNTI may share data:

- With trusted processors under contract (e.g. event platforms, email tools, cloud storage)
- If required by law (e.g. HMRC or law enforcement)

WNTI does not sell personal or commercial data.

#### 6. Data Security

WNTI take appropriate security measures to protect data, including:

- Secure cloud storage with limited access
- Password protection
- Access only by authorised personnel

#### 7. Data Subject Rights

Individuals and organisations have the right to:

- Access their personal / commercial data
- Ask for data to be corrected or deleted
- Object to certain types of processing
- Withdraw consent where applicable.

To make a request, email the WNTI Chief Executive Officer at [p.bryant@wnti.co.uk](mailto:p.bryant@wnti.co.uk). We aim to respond within one calendar month.

#### 8. Data Breaches

Breaches will be assessed and reported to the UK Information Commissioners Office within 72 hours if risk to individuals is identified.

## 9. Review and Continuous Improvement

- The Data Protection and GDPR Policy will be reviewed every 3 years or as needed.
- Lessons learned from incidents and near misses will be used to improve data protection practices.

## Ownership and Responsibilities

The owner of this policy is the WNTI CEO.



Prof. Pete Bryant  
WNTI CEO

## Version Control - Approval and Review

| Version No | Approved By | Approval Date | Main Changes    | Review Period |
|------------|-------------|---------------|-----------------|---------------|
| 1.0        | WNTI Board  | 27/06/2025    | Issued Version. | Every 1 Years |
|            |             |               |                 |               |
|            |             |               |                 |               |