



# IMO 2019

60<sup>TH</sup> INTERNATIONAL  
MATHEMATICAL OLYMPIAD

Honorary Patrons:  
Sir Timothy Gowers FRS  
Dame Frances Kirwan FRS  
Sir Andrew Wiles FRS

## IMO 2019: Data Protection Policy

### 1. Introduction and general principles

- (a) IMO2019 is committed to good practice in the handling of Personal Data and careful compliance with the requirements of the General Data Protection Regulation 2016 (GDPR). We recognise Personal Data as information about a living individual who is identifiable from the data we hold on them.
- (b) Data for most voluntary organisations essentially amounts to:
  - (i) information held on computer;
  - (ii) information in relevant manual files;
  - (iii) information intended to become part of one of these systems.
- (c) As well as text, it can include photos, video and biometric data. It may be held in emails, on phones, tablets, as well as computers and manual filing systems.
- (d) Our priority is to avoid causing harm to individuals, by:
  - (i) keeping information securely in the right hands;
  - (ii) holding good quality information.
- (e) We aim to be open and transparent in the way we use Personal Data, and will seek to give individuals as much choice as is possible and reasonable over what data is held and how it is used.
- (f) The GDPR (see <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/>) contains six basic principles regarding Personal Data, to which IMO2019 will adhere
- (g) These require that Personal Data:
  - (i) Shall be processed lawfully, fairly and in a transparent manner in relation to the data subject;
  - (ii) Collected for specified, explicit and legitimate purpose and not further processed in a manner that is incompatible with these purposes;
  - (iii) Adequate, relevant and limited to what is necessary in relation to the purpose for which they are processed;
  - (iv) Accurate and, where necessary, kept up to date;
  - (v) Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed;
  - (vi) Processed in a manner that ensures appropriate security of the personal data.

#### IMO 2019 Ltd

##### Directors:

Dr Geoff Smith MBE (Chair)  
Prof Adam McBride OBE (Treasurer)  
Dr Ceri Fiddes (Executive Director IMO 2019)  
Mr Graham Keniston-Cooper  
Mrs Sue Rossiter

#### The International Mathematical Olympiad 2019 in the United Kingdom

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Registered address: 16 Bloomfield Drive, Odd Down, Bath, BA2 2BG.

- (h) Operational procedures and guidance to staff and volunteers will set out in more detailed ways in which these objectives can be achieved, through our Policy on the Keeping and Disclosure of Personal.

## 2. Responsibilities

- (a) The board of IMO2019, recognises its overall legal responsibility for GDPR compliance. Day to day responsibility for Data Protection is delegated to a nominated Data Protection Officer, currently the Director. The main responsibilities of the Data Protection Officer are:
  - (i) advising the IMO2019 board on Data Protection responsibilities as required;
  - (ii) reviewing Data Protection and related policies at appropriate intervals;
  - (iii) ensuring that volunteers and staff members have sufficient training in Data Protection matters to carry out their roles within these guidelines;
  - (iv) acting as the contact point for the Information Commissioner;
  - (v) paying any data protection fee due to the Information Commissioner;
  - (vi) handling any Subject Access requests;
  - (vii) approving unusual or controversial disclosures of Personal Data;
  - (viii) approving contracts with Data Processors.
- (b) The IMO2019 board have the following responsibilities:
  - (i) assisting the Data Protection Officer in identifying aspects of their area of work that have Data Protection implications so that guidance can be provided as necessary;
  - (ii) ensuring that operational procedures take full account of Data Protection requirements;
  - (iii) including Data Protection and confidentiality in staff induction and training.
- (c) All IMO2019 staff and volunteers are responsible for understanding and complying with policy and procedures that we have adopted in order to ensure GDPR compliance.
- (d) In dealing with requests under the GDPR, the Data Protection Officer will:
  - (i) ask for the request to be made in writing and forward the relevant form for completion;
  - (ii) verify the identity of anyone making a subject access request;
  - (iii) respond to the written request within one month.