

Niburu Recordings Ltd

GDPR Policy

April 2026

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1. Introduction

This policy explains how Niburu Recordings Ltd collects, uses and protects individuals' personal data in line with the General Data Protection Regulations (GDPR), and the UK Data Protection Act of 2018.

2. Scope

This policy applies to all personal data collected by Niburu Recordings Ltd, including electronically, on paper or any other format.

3. Data Protection Principles

Niburu Recordings Ltd complies with the GDPR principles which require that personal data shall be:

- Processed lawfully and transparently.
- Collected for explicit and legitimate purposes.
- Information is relevant and limited to necessity.
- Accurate and up to date.
- Kept for required periods only.
- Processed securely and protected against unauthorised access.

4. Information Held

As a provider of community based services, an employer and a provider of volunteering opportunities, we hold personal data to ensure the health and safety of everyone we work with and data relating to the information required by government agencies as an employer.

Information held comes directly from the individuals and from referring agencies e.g. Enfield Council. We may be required to share your information if we are under a duty to disclose or share your personal information to comply with a legal obligation or as required by the relevant regulator.

In addition, we process personal data under the following lawful processes:

- Consent: Where individuals have given clear consent.
- Contract: When fulfilling contractual obligations.
- Legal Obligations: To comply with legal requirements and processes.

5. Types of Data Collected

We may collect various types of personal data from you, including but not limited to:

- Contact Information: (Name, address, email address, phone number).
- Demographic information: Age, race, gender.
- Expressions of Interest: e.g. Volunteering.

6. Purpose of Data Processing

We collect data for the following purposes:

- Provision of our services and fulfilment of your requests.
- Communication, including sending relevant updates and notifications.
- Conducting research to improve our services.
- Complying with legal obligations.
- Data sharing and transfers with relevant agencies.
- Employee and volunteer management.

In addition, as an employer and a provider of services which are subject to a contract with funding bodies/organisations, under the GDPR regulations the following applies:

- The data subject has given consent to the processing of his or her personal data for one or more specific purposes.
- Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.
- Processing is necessary for compliance with a legal obligation to which the controller is subject (the controller in this instance is Niburu Recordings Ltd).

7. Data Security

Appropriate technical and organisational measures are in place to protect your personal data from unauthorised access, loss, or disclosure.

These measures include:

- Access control.
- Security assessments.
- Encryption.
- Staff training.

8. Individual's Rights

Niburu Recordings Ltd's GDPR Policy includes the following rights for individuals:

- The right to be informed.
- The right of access.
- The right to rectification.
- The right to erasure.
- The right to restrict processing.
- The right to data portability.
- The right to object.
- The right not to be subject to automated decision-making, including profiling.

9. Data Protection Officer (DPO)

The Chief Executive, governed by the Trustees, holds the responsibility for data protection within Niburu Recordings Ltd.

Responsibilities include:

- Monitoring compliance.
- Advising on data protection obligations.
- Acting as a contact point for data subjects and the Information Commissioner's Office (ICO). The DPO can be contacted at: infonyburu@gmail.com.

10. Access Requests

All access requests (Subject Access Requests) should be made to the Chief Executive at infonyburu@gmail.com and will be dealt with within one calendar month, in accordance with UK GDPR requirements.

11. Data Breaches

- Where we are made aware of a data breach, the Chief Executive and Trustees will undertake an investigation to establish how the breach occurred and address issues arising to ensure that the risk of future breaches can be mitigated.
- Data breaches will be reported to the ICO within 72 hours where required in accordance with the regulations.
- Affected individuals will be notified if there is a high risk to their rights and freedoms.

12. Children

Niburu Recordings Ltd holds no data on children under the age of 18 years. Where data is required on persons under the age of 18 we will ensure that it is provided by an appropriately authorised adult, e.g. parent or primary carer.

13. Data Protection by Design & Data Protection Impact Assessments

GDPR makes privacy by design an express legal requirement, under the term 'data protection by design and by default'. It also makes Privacy Impact Assessments (PIAs) — referred to as 'Data Protection Impact Assessments' — mandatory in certain circumstances. The data processing carried out by and on behalf of Niburu Recordings Ltd is not likely to result in high risk to individuals.

14. International

Niburu Recordings Ltd only operates within the United Kingdom and no data is shared outside of the European Economic Area.