



# DATA PROTECTION POLICY





## **Data Protection Policy**

The Peninsula Villages Community Land Trust (PVCLT) holds data about members and other individuals for a variety of business purposes in pursuance of its objects.

This policy sets out how personal data is protected and ensures that members and trustees understand the rules governing the use of personal data.

The Data Protection Officer, Jenny Brown, has overall responsibility for the day-to-day implementation of this policy. Any enquiries should be sent to her using the following details: [admin@peninsulavillagesclt.com](mailto:admin@peninsulavillagesclt.com).

## **Business Purposes**

### **Members**

In addition to data retained for the purposes of membership administration (such as date joined), the following personal data is collected:

- Name;
- Address;
- Email address;
- Telephone number(s).

This personal data is collected by the following means:

- Membership application form.

This personal data is used for the following purposes:

- Governing the CLT, for example invitations to Annual General Meetings;
- Email updates on the progress of PVCLT;
- Informing members of opportunities to engage with the work of the CLT;
- Investigating complaints.

This data is not shared with any other organisation without the explicit consent of the member.

Aggregate membership information, without any identifying individual data, is shared with interested parties as appropriate.

Personal data is retained only as long as the data subject continues to be a member of PVCLT.

## **Interested Parties**

The following personal data may be collected for individuals who interact with PVCLT via its website or on social media:

- Email address;
- Social media username.

This personal data is collected by the following means:

- Website contact;
- Social media platforms, such as Facebook, Instagram and Twitter.

This personal data is used for the following purposes:

- To respond to comments, questions or feedback.

This data is not shared with any other organisation.

This data is retained only as long as the data subject continues to interact with PVCLT.

## **Prospective Tenants**

The following personal data is collected from local people who express an interest in renting or purchasing an affordable home from PVCLT:

- Name;
- Address;
- Email address;
- Telephone number(s).

This personal data is collected by the following means:

- Expressions of Interest form.

This personal data is used for the following purposes:

- Email updates on the progress of PVCLT homes;
- Investigating complaints.

This data is not shared with any other organisation without the explicit consent of the data subject.

Aggregate information, without any identifying individual data, is shared with interested parties as appropriate.

Personal data is retained only as long as the data subject continues his or her interest in obtaining a PVCLT home.

## **GDPR**

The General Data Protection Regulation (GDPR) came into force in May 2018 and governs how PVCLT can communicate with members, supporters and prospective tenants. To comply with GDPR, members, supporters and prospective tenants are asked to consent specifically to being contacted by email, post and telephone.

# Procedures

## 1. Fair and Lawful Processing

Personal data is processed fairly and lawfully in accordance with individuals' rights. This generally means that personal data will not be processed unless the individual whose details are being processed has consented to this happening.

## 2. Accuracy

PVCLT will ensure that any personal data processed by them is accurate, adequate, relevant and not excessive, given the purpose for which it was obtained, and that it is not held for longer than is necessary for the business purposes set out above. PVCLT will not process personal data obtained for one purpose for any unconnected purpose unless the individual concerned has agreed to this or would otherwise reasonably expect this.

Individuals may ask that PVCLT corrects inaccurate personal data relating to them. If an individual believes that information is inaccurate they should record the fact that the accuracy of the information is disputed and inform the Data Protection Officer.

## 3. Data Protection Officer's Responsibilities

- Keeping the Board of Trustees updated about data protection responsibilities, risks and issues.
- Reviewing all data protection procedures and policies on a regular basis.
- Ensuring data protection statements are attached to all forms used to collect personal data, and to all marketing materials.
- Addressing any data protection queries from members, supporters and other stakeholders.
- Ensuring all systems, services, software and equipment meet acceptable security standards.
- Arranging data protection training and advice for all trustees, contractors and volunteers.

## 4. Responsibilities of Trustees, Contractors and Volunteers

- Process personal data only for the purposes set out in this policy.
- Store electronic data in secure systems, and paper records in a secure place.
- Generally avoid storing personal data on mobile devices such as laptops, phones and memory sticks, and where it is necessary to then use password protection.
- Report any concerns or breaches to the Data Protection Officer immediately, and take remedial steps if necessary.

## 5. Subject Access Requests

A data subject may, subject to certain exceptions, request access to information held about them via the Data Protection Officer.

## 6. Data Portability

Upon request, a data subject has the right to receive a copy of their data in a structured format. These requests should be processed within one month, provided there is no undue burden and it does not compromise the privacy of other individuals. A data subject may also request that their data is transferred directly to another system. This must be done for free and can be requested via the Data Protection Officer.

## **7. Right to be Forgotten**

A data subject may request that any information held about them is deleted or removed, and any third parties who process or use that data must also comply with this request. An erasure request can be requested via the Data Protection Officer and can only be refused if an exemption applies.

## **8. Data Transfers**

No data will be transferred beyond organisations directly connected with the PVCLT without the explicit consent of the data subject.