

# Nympsfield Community Pub Limited

## Data Policy

Approved by the Management Committee 03/09/24

Version	Date	Details
1	07/08/24	First version
2	03/09/24	To include working group members in the creation phase of the Members Register

### 1. Introduction and Purpose

1.1. This policy is to ensure that anyone who wishes to become, or already is, a Member of the Society or has provided their name and email address for the mailing list understands the use of their data.

### 2. Access to Information

#### 2.1. Members Register

- Nympsfield Community Pub Limited (NCPL) will at all times adhere to the principles of the Data Protection Act (DPA) which is the UK's implementation of the General Data Protection Regulation (GDPR). It is a statutory requirement that the Society maintain at all times an up-to-date Members Register of all individuals who own shares in the Society.

By applying for membership and shares you must agree to the following information being held on the Society's electronic database:

- Name
  - Address
  - Phone number
  - Email address
  - Amount invested
  - Number of shares allocated
- You must confirm you understand that this information will be used for the purpose of maintaining a register of members as required by the Society's Rules and to help with Society management and member engagement. This information will be available to members of the Management Committee and members of the working group involved in the creation of the Members Register.

#### 2.2. Mailing List

- By providing your details for the mailing list you agree to the following information being held on the Society's electronic database. This information will be available to the Management Committee and selected

members of the Communications Working Group but will not be shared with other volunteers.

This information will be used to provide you with:

- Updates on NCPL
- Advertising fundraising events

Your personal information will be kept secure at all times against unauthorised or unlawful processing. NCPL will take great care of your personal data giving it the respect and security it deserves.

### **3. How we use your data**

3.1. We will only use your data in a manner that is appropriate considering the basis on which that data was collected, as set out in the table at the top of this policy.

For example, we may use your personal information to:

- reply to enquiries you send to us
- request to be added to our mailing list in order to receive regular updates about NCPL
- handle donations, when becoming a Member or other transactions that you initiate

### **4. When we share your data**

4.1. We will only pass your data to third parties in the following circumstances:

- you have provided your explicit consent for us to pass data to a named third party
- we are using a third party purely for the purposes of processing data on our behalf and we have in place a data processing agreement with that third party that fulfils our legal obligations in relation to the use of third party data processors
- we are required by law to share your data

### **5. How long we keep your data**

5.1. We take the principles of data minimisation and removal seriously and have internal policies in place to ensure that we only ever ask for the minimum amount of data for the associated purpose and delete that data promptly once it is no longer required. Where data is collected on the basis of consent, we will seek renewal of consent at least every three years.

### **6. Rights you have over your data**

6.1. You have a range of rights over your data, which include the following:

- where data processing is based on consent, you may revoke this consent at any time and we will make it as easy as possible for you to do this (for example by putting 'unsubscribe' links at the bottom of all our marketing emails)

- you have the right to ask for rectification and/or deletion of your information
- you have the right of access to your information
- you have the right to lodge a complaint with the Information Commissioner if you feel your rights have been infringed

6.2. A full summary of your legal rights over your data can be found on the Information Commissioner's website here: <https://ico.org.uk/>

6.3. If you would like to access the rights listed above, or any other legal rights you have over your data under current legislation, please get in touch with us. Please note that relying on some of these rights, such as the right to delete your data, will make it impossible for us to continue to deliver some services to you. However, where possible we will always try to allow the maximum access to your rights while continuing to deliver as many services to you as possible.