



GDPR POLICY

Eden Park Allotment Association (EPAA) is committed to protecting and respecting the privacy of all its members.

Our privacy policy (including any other documents referred to in it) sets out the basis on which we process any personal data that we collect from you or about you that you provide to us or that we receive from other sources. By processing, we mean when we collect, use, store, delete and otherwise manipulate or access personal data.

If we ask you to provide information from which you can be identified, including as a result of using our website, it will be used in accordance with this privacy policy and any subsequent revisions.

Please read this policy carefully to understand our practices regarding your personal data and how we will treat it. We recommend that, from time to time, you visit our website to review this policy to stay up to date with any changes to it.

Registering with the Information Commissioner:

Since our allotment association processes only information which is relevant to managing our allotment sites and the affairs of our Association, we do not need to register with the Information Commissioner.

However, we must still obey the current legal requirements in the processing we do.

What personal data do we collect and process?

To manage your membership of the EPAA, we will process personal data about our members, such as your full name, postal address, e-mail address, and landline and/or mobile phone numbers.

If relevant, we may also collect and hold data such as details about your plot and/or other information that helps us to provide our members with a better service that is capable of being tailored to specific requirements or particular needs.

How do we collect this personal data?

Information that you give to us:

This is the personal data that you provide to us, for example by filling in forms we send you links to or by corresponding with us by phone, e-mail, post, social media or otherwise.

This personal data would relate to applications for membership, requests to rent a plot or work on the community garden, entering any events, or any other communications relating to your membership of the association.

Information we collect when visiting our website:

We monitor website behaviour through Google Analytics. We collect information about how each visitor uses our site. These are then used to compile reports and to help us improve our site. Information is collected in an anonymous form, including:

The number of visitors to the site, where visitors have come to the site from and the pages visited.

Information that we may collect from your visit includes your device's Internet protocol (IP) address, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), services you viewed or searched for, page response times, and length of visits to certain pages.

If you prefer, you can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies via your browser settings. Like most websites, if you turn your cookies off, some of our services may not function properly.

For what purposes do we collect and use your personal data?

Our general policy:

To meet requirements of GDPR the association will:

- Only collect information needed for the business of the association – We will ask the question “Does the association really need to keep this item of information on file?”
- Keep it secure – The association will not allow members access to each other's personal data. For example e-mails to all members will use blind copies, so that members do not see everyone else's e-mail address. Committee members are entitled to access all information held by their society or its officers acting for the society, but they will not be asking for personal data unless they need it to discharge their duty as a committee member.
- Ensure it is relevant and up to date: Members will be asked to confirm or correct the information the association holds about them when they pay their rent or renew their membership each year. A review may be conducted if felt necessary by the allotment committee.
- Only hold as much data as needed, and only for as long as needed – There are good reasons for holding ex-plot holders' details for a time in case of further contact. Records will not include member's age or date of birth.
- Allow the subject of the information to see it on request – This is a legal right, and members will be allowed to inspect the data held on them.

We process the personal data held about you in the following ways:

- To manage your application for membership of the association.
- To manage your application for rental of a plot or use of the community garden.
- To administer your membership of the association.
- To notify you of events that the association is organising for members
- To send periodic emails. The email address you provide when applying for membership, may be used to send you information and updates pertaining to your membership.
- To enable compliance with statutory and legal obligations.
- To administer and improve our website and other communications with you.

- To respond to any complaint that you might make.
- To contact you in an emergency.
- To answer general enquiries that you may make.

We will not process your personal data:

- To conduct market research.
- To pass it to a third party without your consent.
- To sell it to a third party.

When do we disclose personal data?

- To fulfil our statutory obligations with regards to our association membership of The National Society of Allotment and Leisure Gardeners (NSALG), it may be necessary for Eden Park Allotment Association to share your personal data with others, including: if you are a member of the EPAA; we are required to pass your details on to the NSALG for membership purposes and the NSALG will in turn pass your details to Total Shield Insurance for you to be eligible for Allotmenters' Insurance as part of your NSALG membership. We will make this passing on of personal data clear when we collect it.
- And as might be required by law, including compliance with any court order or legal obligation.

When do we delete personal data?

- EPAA may delete your personal data if we cannot contact you for a prolonged period.
- If requested to as per "erasure" below.

What are your rights?

GDPR provides you with a number of rights in relation to your personal data. These include rights to the rectification or erasure of your personal data, and to restrict or object to its processing.

Rectification:

If you find that any of the personal data that we hold about you is inaccurate, incomplete or contains errors, please notify us in writing and we shall undertake to make the appropriate corrections at the earliest opportunity.

Erasure:

Should you wish to have some or all of your personal data erased, we will endeavour to do so although there may be instances where legitimate interests or the performance of our statutory obligations prevent us from doing so. The erasure of your personal data could result in an inability to provide you with some or all of our services.

Restriction or objection:

If you wish to object to or restrict how your personal data is processed by us, you can do so by writing to us. Please see our contact details below. Please be aware that such requests could result in an inability to provide you with some or all of our services.

Portability:

You may request that EPAA provide the personal data that we hold about you to another data controller in a structured, commonly used and machine-readable format.

Access:

You may request to be told whether or not personal data about you is being processed by Eden Park Allotment Association. If your personal data is being processed, you are entitled to receive a response from us that provides you with a description of that personal data, the purpose for which it is processed, the recipients or category of recipients to whom that data is disclosed (including any recipients located outside the EPAA), the source of the personal data, and information about its retention and storage. A copy of the personal data that is undergoing processing shall be provided to you.

To make such requests, you can email us at treasurerepaa@gmail.com.

Changes to our privacy policy:

If in the future we make any changes to our privacy policy, the latest version of our privacy policy will be posted on our website.

Contacting us:

Your questions, comments or requests relating to our processing of your personal data or this policy are welcome, and you may contact us via the Contact Us page on the website. This webpage provides a number of contact details relating to our different interests.

Alternatively, you may contact us in relation to data protection matters by emailing us at:

Email: treasurerepaa@gmail.com.