



# PRIVACY AND DATA PROTECTION POLICY

Based on National CLT network model policy  
Approved by the board on 10<sup>th</sup> July 2019

## General

1. We, START Community Trust (Community Benefit Society No. 8087), take the privacy of our members and other supporters very seriously and guarantee to safeguard it to the very best of our ability.
2. We hold data about our members and other individuals only for legitimate, and transparent business purposes in pursuance of our objects.
3. This policy sets out how we seek to protect personal data and ensure that our members and officers understand the rules governing our use of personal data.
4. Our data protection officer, Neil Ryder, has overall responsibility for the day-to-day implementation of this policy. Any enquiries should be sent to him at: [neil.ryder@start-ct.org.uk](mailto:neil.ryder@start-ct.org.uk).

## Data collection purposes

### 5. Members:

In addition to data retained for the purposes of membership administration (such as when you joined), we will collect and use the following personal data:

- Name
- Address and/or email address
- Telephone number
- Age

We will collect this personal data by the following means:

- Membership application forms
- Website forms

We will use this personal data for the following purposes:

- Governing the CLT, for example inviting you to annual general meetings.
- Informing you of opportunities to engage with our work, for example feeding into the design for a housing development.
- Investigating complaints.
- Improving our service to members.

We will **never** share this data with any other organisation without your explicit consent. We will share only analytical information on our membership without any identifying individual data, based on this data, with interested parties.

We will retain this data so long as you are a member of the CLT.

### 6. Supporters

We may collect the following personal data for other individuals who may support or be interested in our work, or our newsletter:

- Name
- Email and/or postal address
- Telephone number

We will collect this personal data by the following means:

- Website form.
- Sign-up sheets at meetings etc.

We will use this personal data for the following purposes:

- Updates on the CLT and our work.

We will **never** share this data with any other organisation.

We will retain this data so long as you subscribe to our newsletter or other activity lists

### 7. Housing needs surveys

Where we undertake housing needs surveys we may collect detailed personal data on households, including data on each individual in the household and your financial circumstances. The information provided will be used by the CLT to provide information for a housing needs survey report, to justify and plan developments, and we will **never** share or publish data which can identify any individual. More detail on the information to be collected, the purposes, how we will use the data, and with whom it will be shared, will be set out on the survey.

## **Fair and lawful processing**

8. We will process personal data fairly and lawfully in accordance with individuals' rights. This generally means that we should not process personal data unless the individual whose details we are processing has consented to this happening.
9. We will store the information only on totally secure, UK-based servers and all such files will be encrypted and protected by strong passwords.

## **Accuracy**

10. We will make every effort to ensure that any personal data we process 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. We 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.
11. Individuals may ask that we correct inaccurate personal data relating to them. If you believe that information is inaccurate you should record the fact that the accuracy of the information is disputed and inform the data protection officer.

## **The data protection officer's responsibilities**

- Keeping the board 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 officers and staff.
- Checking and approving with third parties that handle the company's data any contracts or agreement regarding data processing.

## **Responsibilities of other officers, staff and volunteers (data processors)**

- Only to process personal data for the purposes set out in this policy.
- To store electronic data in secure systems, and paper records in a secure place.
- To 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.
- To report any concerns or breaches to the Data Protection Officer immediately, and to take remedial steps if necessary.

## **Subject access requests**

A data subject may, subject to certain exceptions, to request access to information held about them. Please contact the data protection officer if you would like to correct or request information that we hold about you. There are also restrictions on the information to which you are entitled under applicable law.

## **Data portability**

Upon request, a data subject should have 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. Please contact the data protection officer with any such requests.

## **Right to be forgotten**

A data subject may request that any information held on them is deleted or removed, and any third parties who process or use that data must also comply with the request. An erasure request can only be refused if an exemption applies. Please contact the data protection officer with any such requests.

## **International data transfers**

No data will be transferred outside of the EEA without the explicit consent of the data subject.