

Data Protection and Privacy Policy

Email: greatgransdencbsltd@gmail.com

Website: www.greatgransden.com

Approved: [Date of approval]

Next review: [Date – normally 12 months after adoption]

Status: Draft for Management Committee approval

1. Introduction

Great Gransden Community Benefit Society Limited ("the Society") is committed to protecting the privacy and personal information of its members, shareholders, supporters, volunteers and everyone who communicates with us.

The Society was established to work for the benefit of the community, including securing the future of the Crown & Cushion public house in Great Gransden as a valued community asset.

In carrying out these activities, we may need to collect and use certain personal information.

We will handle this information responsibly, securely and in accordance with applicable UK data protection legislation, including the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and subsequent amendments.

The Society is the data controller responsible for the personal information it holds.

2. Information We Collect

Depending on your relationship with the Society, we may collect:

- Your name, postal address, email address and telephone number.
- Membership details and records of community shares held.
- Information relating to share applications, payments and transactions.
- Records of donations or financial contributions.
- Correspondence and enquiries sent to the Society.
- Details of participation in Society meetings, events and voluntary activities.

- Communication preferences, including whether you wish to receive news and updates.

We will only collect information that is reasonably necessary for the Society's activities and legal obligations.

3. How We Use Personal Information

We use personal information to:

- Maintain the Society's membership and share registers.
- Administer membership, community shares and financial transactions.
- Communicate with members about Society business, meetings, voting and statutory matters.
- Respond to enquiries and correspondence.
- Provide news and updates about the Society's activities and the campaign to save the Crown & Cushion.
- Organise community meetings, events and voluntary activities.
- Meet our legal, regulatory and financial obligations.

We will not use personal information for purposes incompatible with those for which it was collected.

4. Our Legal Basis for Using Information

Under UK data protection legislation, the Society must have a lawful basis for collecting and using personal information.

Depending on the circumstances, these may include:

Legal obligation: Where information must be retained or processed to comply with legislation, including requirements relating to membership records, financial accounts and the administration of the Society.

Contractual necessity: Where information is needed to administer membership, share applications or other agreements with individuals.

Legitimate interests: Where information is reasonably required for the Society's administration, governance and community-benefit activities, provided those interests do not override individuals' rights and freedoms.

Consent: Where individuals have agreed to receive optional communications or to a particular use of their information.

Where we rely on consent, individuals may withdraw it at any time.

5. Communications with Members and Supporters

The Society may contact members about matters directly connected with their membership, including general meetings, voting, community shares and other Society business.

We may also send supporters and members updates about the campaign to save the Crown & Cushion, fundraising activities, events and opportunities to become involved, where permitted by data protection and electronic marketing legislation.

Individuals may opt out of optional communications at any time by contacting the Society.

Opting out of campaign updates will not affect essential communications relating to Society membership or legal obligations.

6. Sharing Personal Information

The Society will not sell, rent or trade personal information to third parties.

Information may be shared where reasonably necessary with:

- Authorised Management Committee members and volunteers carrying out Society duties.
- Banks, accountants, professional advisers and service providers assisting with Society administration.
- Regulatory authorities where disclosure is legally required.
- Providers of secure electronic record-keeping, email or website services.

Any sharing will be limited to what is necessary and subject to appropriate safeguards.

We will not disclose membership or supporter contact details to other members or outside organisations for unrelated purposes without an appropriate lawful basis.

7. Keeping Information Secure

The Society will take reasonable technical and organisational measures to protect personal information against unauthorised access, accidental loss, misuse or disclosure.

These measures will include:

- Restricting access to personal information to authorised individuals.
- Using appropriate password protection and secure electronic storage.
- Keeping paper records securely.
- Taking reasonable care when sending personal information by email.
- Ensuring that committee members and volunteers understand their responsibilities for confidentiality.

Any suspected loss or unauthorised disclosure of personal information must be reported promptly to the Management Committee so that appropriate action can be taken.

8. How Long We Keep Information

We will retain personal information only for as long as necessary for the purpose for which it was collected, or to comply with legal and regulatory requirements.

Membership and shareholding records may need to be retained for the duration of membership and for an appropriate period afterwards.

Financial and transaction records will be retained for the periods required by applicable law.

Supporter contact information will be reviewed periodically and removed when no longer required, subject to any continuing lawful reason for retention.

Information that is no longer required will be securely deleted or destroyed.

9. Your Rights

Under UK data protection legislation, individuals have rights concerning their personal information.

Depending on the circumstances, these include the right to:

- Request access to personal information held about them.
- Request correction of inaccurate or incomplete information.
- Request deletion of information where there is no continuing lawful reason to retain it.
- Object to certain uses of their information.

- Request restrictions on how their information is used.
- Request transfer of their information where the right to data portability applies.
- Withdraw consent where processing is based on consent.

These rights are subject to applicable legal conditions and exemptions.

Requests concerning personal information should be sent to greatgransdenCBSLtd@gmail.com.

The Society will respond within the timescales required by law.

10. Website and Cookies

The Society's website, www.greatgransden.com, may use cookies or similar technologies necessary for its operation.

Where additional cookies or website analytics are used, the Society will provide appropriate information and obtain consent where required by law.

Information submitted through website contact forms or other electronic communications will be handled in accordance with this policy.

11. Data Protection Complaints

Anyone concerned about how the Society has collected, used or protected their personal information may make a complaint by emailing:

greatgransdenCBSLtd@gmail.com

The Management Committee will ensure that complaints are acknowledged within 30 days, investigated without undue delay and that the complainant is informed of the outcome.

Individuals also have the right to complain to the Information Commissioner's Office (ICO), the UK's independent data protection regulator.

Website: www.ico.org.uk

12. Responsibility for Data Protection

The Management Committee has overall responsibility for ensuring that the Society complies with applicable data protection legislation.

Committee members and volunteers who have access to personal information must use it only for authorised Society purposes and maintain appropriate confidentiality.

The Committee will ensure that any personal data breach is assessed promptly and reported to the ICO and affected individuals where legally required.

13. Review

The Management Committee will review and approve this policy at least annually, in accordance with Rule 9.12, and sooner if legislation, the Society's Rules or operating arrangements change. The Secretary will retain the approved version and record the approval date.

Approved by the Management Committee: [date]

Signed for the Committee: [name/office]

Next review and approval: [date]