

General Data Protection Regulations

Privacy Policy

About this policy

This policy explains when and why we, Cosham & District Allotments & Gardens Association, collect personal information about our members and how we use it, keep it secure, and the association member's rights in relation to it. We will collect, use and store personal data, as described in this Data Protection Policy when people join the Association.

We reserve the right to amend this Data Protection Policy from time to time without prior notice. You are advised to check the notice board situated near the shop regularly for any amendments. We will only share your personal data with any third parties as outlined below.

We will always comply with the General Data Protection Regulation (GDPR) when dealing with your personal data. Further details on the GDPR can be found at the website for the Information Commissioner (www.ico.gov.uk).

Responsible person

For the purposes of the GDPR, the Association Membership Secretary* will be the "controller" of all personal data we hold about Association members and others. The Membership Secretary * is responsible for making sure the Association complies with the General Data Protection Regulation (GDPR) which applies from 25 May 2018. We will review personal data every year to establish whether we are still entitled to process it or not.

Member's rights

You have rights under the GDPR:

- To access your personal data
- To be provided with information about how your personal data is processed
- To have your personal data corrected
- To have your personal data erased in certain circumstances
- To object to or restrict how your personal data is processed in certain circumstances

For more details, please address any questions, comments and requests regarding our data processing practices to Membership Secretary at salisburyroadallotments@gmail.com

Specific use and sharing of personal information

Your personal data (name and contact details – to include address, telephone number(s) and email address) will only be used in the legitimate interests of members to contact them and keep them informed of Association matters.

In general your personal data will only be used for the purposes of membership management and your address, email and telephone numbers may be used for communication about news/work at the allotment site, closure, competition entries/results and other important notices etc.

Your name/address telephone number and email address may be shared with the police to assist their investigations should you suffer damage to your allotment or to any of the buildings there on. You must inform us in writing if you do not wish us to do this.

Your contact data may also be used to contact your next of kin in the event of you or any authorised user of your plot being injured or falling ill. It will also be shared with the emergency services should it be necessary to call them on your or the authorised plot user's behalf.

Your personal data will not be shared/sold with/to any other third party outside or within the Association your email will only be given to someone outside the association, beyond the caveats just stated, with your permission.

The Lawful reasons for processing and storing your data.

Processing and storing your data is necessary for the administration of your membership details:

In order to contact members and keep them informed of Association matters.

To identify subscription payment and renewal dates.

To provide a means of contact with next of kin in case of emergencies.

To provide emergency medical services with next of kin contact in case of injury or illness.

To identify bona fide paid up members of subscriptions should a member wish to make an insurance claim via the Association's Insurance Policy.

To provide details to the investigating authorities of a member's contact details if a member's plot is subject to vandalism – Please Note this will not be done if a member explicitly requests so.

You have given signed consent by signing the consent form circulated the week beginning 17th September or by explicitly giving your consent by email. Or by signing the membership registration form available upon joining the Association's allotment site.

The tables below gives further explanation of which lawful reason applies to which data, why we collect it and who we may share it with. The Association will make every effort to ensure data is only shared with organisations that are GDPR compliant.

What Information we collect, why we collect it, and who we share it with

In addition to the reasons stated below we may have to disclose your data where we have an inescapable legal obligation.

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Data processed as a requirement of managing your membership

Type of information	Purpose	Shared with
Lease holder's full name, address, telephone numbers and e-mail address.	To contact members and keep them informed of Association matters	<p>Relevant Committee Members, associated government departments (Medical and Police) and the Association's Insurers.</p> <p>Individual members may withdraw permission to share data with any of the non committee members mentioned above upon receipt of a written request.</p>
Lease holder's full name, address, telephone numbers and subscription payment details.	To provide our insurance company with relevant details in the event of a claim via the association's insurance policy.	
Co-worker's name	Helping to ensure only authorised personnel are accessing the plot. And cross reference with lease holder in case of emergency.	
Lease holder's full name, address, telephone numbers.	To provide a means of contact with next of kin and for emergency services in case of injury or illness.	
Lease holder's full name, address, telephone numbers.	To provide a means of contact with lease holder in the event of vandalism on their plot.	
Lease holder's full name, address, telephone numbers.	To provide a means of contact for the investigating authorities.	

Please note data processed for compliance with insurance purposes must be kept for 30 years from the end of your membership and is therefore exempt from your right to erasure under GDPR.

Data processed with your consent

The Association will seek consent in the application form before processing any information as outlined below.

Type of information	Purpose	Shared with
Member's, name, address, telephone numbers, e-mail address	Managing the Member's membership of the Association.	Committee members who are responsible for various aspects concerned with contacting members and keeping them informed of Association matters.
Lease holder's named co-worker.	To support lease holder in maintaining authorised access to their plot.	
Subscription Details and dates	Auditing purposes, and cross reference for use of shop and in the event of an insurance claim.	

Enquiries and other communications with the Association.

When enquiring about the Association we may hold your details for a period of time to deal with the enquiry. Any emails and other communications with the Association will only be retained for a period of time appropriate to the content or request. Association member's emails will be purged on a regular basis. Every new member will be asked to complete a membership form on collecting keys at the shop. The form will provide options to agree or not agree to us storing the data at that point. A copy of this privacy document will be available from the shop during open hours.

How we protect your personal data

The Data Controller will process membership information electronically and hold all information on a database on a secure computer away from the allotment site. The file is protected by an encrypted password, and the computer is accessed solely by the data controller and provides for the usual MS entry protection routines. A backup of this data will be held on a flash drive, sometimes referred to as a memory stick. There will be a two step "generation" backup procedure applied to this data with the father/son versions being regularly interchanged. The backup will be stored in a separate location (Chairman's residence) it will also be protected by encrypted passwording. A paper copy of the password details will be given in a sealed envelop to a third member of the committee in case of emergency or illness. There will be no other full digital copies of the data held.

To facilitate any relevant association communications a further digital copy to include First and Second Names, Plot Numbers, and Email Addresses only will be held by the Chairman upon his personal computer in his residence. This is also guarded by the passwording protocol of entry into an IMac machine. This data will be an identical copy of the data recorded in the parent database and will be refreshed on a regular basis by digital transfer (NOT via the Internet) from the parent database.

Paper copies of the full data will also be held by the Shop Manager. This will take the form of a registration book. It will be stored at the Shop Manager's residence when he is not on duty at the shop. Whilst at the shop it will be stored in a secure cabinet when not being referenced by the Shop Manager. This is seen as a vital form of further backup and instantaneous referencing in the emergency circumstances outlined previously.

The Shop Manager also undertakes to receive updates to existing member's data on a sheet held in the shop (See Appendix A) which is duly recorded in the written records and passed to the Membership Secretary on a regular basis.

The Shop Manager also undertakes to ensure that all new members complete an application form (See Appendix B), whilst pointing out the availability of a copy of this Privacy Policy document held in shop.

If it is necessary to transport data it will be kept secure.

In the unlikely event of a breach of the security of data we will notify members promptly and we will never sell or pass on your personal data.

Request to see your personal information

If you wish to know what personal data the Association holds please email the Membership Secretary via salisburyroadallotments@gmail.com and he will respond within 14 days of the request (depending on availability).

Accuracy and retention of data

Each individual member is responsible for keeping the Membership Secretary informed of changes to their data via salisburyroadallotments@gmail.com (e.g. address/telephone number etc.) or via the shop update sheet (Appendix A).

The data kept in digital format in the locations mentioned above will be deleted when a member terminates their membership.

The paper data will be normally be kept for up to 7 years to provide for historical records – data may be deleted from the paper records if requested it is done so on membership termination.

It may be kept for a longer period for reasons of legal and civil action or other ongoing case management.

Name, address and length of membership will be kept for up to 30 years for management of historical insurance claims.

Names and scores may be kept indefinitely for reason of historical significance – e.g. on trophies, plaques and other awards.

Email details appended to Mailing List

Initials _____

Date _____