



The Hullavington Community Benefit Society Limited

Data Protection Policy

INTRODUCTION:

The Hullavington Community Benefit Society Limited (“the Society”) values the trust placed in it by members, employees, suppliers/contractors, etc, who provide their personal data. Data security is one of our highest priorities and we therefore aim to be as clear and open as possible about what we do with personal data and why.

We are committed to privacy, therefore records will be designed, used and stored to assure privacy. Legislative controls over data and records will be adhered to as set out in the Data Protection Act 2018 (DPA) and the General Data Protection Regulations (GDPR).

DATA PROTECTION POLICY:

1. Definitions

- a. Personal data is information about a person which is identifiable as being about them. It can be stored electronically or on paper and includes images and audio recordings as well as written information.
- b. Data protection is about how we, as an organisation, ensure we protect the rights and privacy of individuals, and comply with the law, when collecting, storing, using, amending, sharing, destroying or deleting personal data.

2. Responsibility

- a. Overall and final responsibility for data protection lies with the management committee, who are responsible for overseeing activities and ensuring this policy is upheld.
- b. All employees and volunteers are responsible for observing this policy, and related procedures, in all areas of their work for the Society.

3. Overall policy statement

- a. The Society needs to keep personal data about its committee, members, employees, volunteers, supporters and suppliers in order to carry out Society activities.
- b. The Society will collect, store, use, amend, share, destroy or delete personal data only in ways which protect people’s privacy and comply with the General Data Protection Regulation (GDPR) and other relevant legislation.
- c. The Society will only collect, store and use the minimum amount of data that we need for clear purposes, and will not collect, store or use data we do not need.
- d. The Society will only collect, store and use data for:
 - purposes for which the individual has given explicit consent, or
 - purposes that are in the Society’s legitimate interests, or
 - contracts with the individual whose data it is, or
 - to comply with legal obligations, or to protect someone’s life, or
 - to perform public tasks.
- e. The Society will provide individuals with details of the data we have about them when requested by the relevant individual.
- f. The Society will delete data if requested by the relevant individual, unless we need to keep it for legal reasons.
- g. The Society will endeavour to keep personal data up-to-date and accurate.
- h. The Society will store personal data securely.

- i. The Society will keep clear records of the purposes of collecting and holding specific data, to ensure it is only used for these purposes.
- j. The Society will not share personal data with third parties without the explicit consent of the relevant individual, unless legally required to do so.
- k. The Society will endeavour not to have data breaches. In the event of a data breach, we will endeavour to rectify the breach by getting any lost or shared data back. The Society will evaluate its processes and understand how to avoid it happening again. Serious data breaches which may risk someone's personal rights or freedoms will be reported to the Information Commissioner's Office within 72 hours, and to the individual concerned.
- l. To uphold this policy, the Society will maintain a set of data protection procedures for our committee and volunteers to follow.

DATA PROTECTION PROCEDURES:

1. Introduction:

- a. The Society has a data protection policy which is reviewed regularly. In order to help it uphold the policy, the Society has created the following procedures which outline ways in which it collects, stores, uses, amends, shares, destroys and deletes personal data.
- b. These procedures cover the main, regular ways the Society collects and uses personal data. The Society may from time to time collect and use data in ways not covered here. In such cases the Society will ensure its Data Protection Policy is upheld.
- c. Having consulted the Information Commissioner's Office (ICO) website, the Society does not have to register as it meets the exemptions as only holding information to maintain membership and support, and any profits are for the Society's own purpose and not to enrich others.

2. General procedures

- a. Data will be stored securely. When it is stored electronically, it will be kept in password protected files. When it is stored online in a third-party website (e.g. Google Drive) the Society will ensure the third-party complies with the GDPR. When it is stored on paper it will be filed carefully in a locked filing cabinet.
- b. When the Society no longer needs data, or when someone has asked for their data to be deleted, it will be deleted securely. The Society will ensure that data is permanently deleted from computers, and that paper data is shredded and/or burned.
- c. The Society will keep records of consent to collect, use and store data. These records will be stored securely.

3. Mailing list

- a. The Society may maintain a mailing list which will include the names and contact details of people who have indicated they want to receive information from the Society or become Members.
- b. When people sign up to the list the Society will explain how their details will be used, how they will be stored, and that they may ask to be removed from the list at any time.
- c. The Society will not use the mailing list in any way that the individuals on it have not explicitly consented to and will not provide the list to third-parties other than as described in these procedures.
- d. The Society will provide information about how to be removed from the list with every mailing.

4. Contacting volunteers

- a. Local people volunteer for the Society in a number of ways.
- b. The Society will maintain a list of contact details of our recent volunteers. The Society will share volunteering opportunities and requests for help with the people on this list.
- c. People will be removed from the list if they have not volunteered for the group for 12 months.
- d. When contacting people on this list, the Society will provide information that their details can be deleted or amended at any time.
- e. To allow volunteers to work together to organise for the Society, it is sometimes necessary to share volunteer contact details with other volunteers.

5. Contacting committee members

- a. Committee members need to be in contact with one another in order to run the organisation effectively and to ensure its legal obligations are met.
- b. Committee contact details will be shared among the committee.
- c. Committee members will not share each other's contact details with anyone outside of the committee, or use them for anything other than Society business, without explicit consent.

POLICY & PROCEDURE VERSION CONTROL:

The Policy and Procedures will be reviewed following the appointment of the Tenant and thereafter regularly, at least every two years.

Version	Management Committee Review and approval date	Next Review Date	Summary of changes
1.0	20/05/2024	May 2026	New policy and procedures prepared & approved.