



WEMBURY ALLOTMENT ASSOCIATION

Affiliated to NSALG

Data Protection Privacy Notice

1. Introduction

Under the Data Protection Act, registration with the Information Commissioners Office (ICO) is not required if:

- the organisation does not use CCTV
- is established for non-profit purposes
- does not make a profit; or if the organisation makes a profit it is for its own purposes
- the organisation does not hold 'sensitive data' as defined under the Act.

The Wembury Allotment Association (WAA) is not therefore required to register with the ICO. Nevertheless, under the Act, the WAA has a duty of care. For more information see the ICO website: <https://ico.org.uk/>

2. What data do we keep?

The WAA holds the data a member or prospective member provides on their tenancy agreement to or in applying for an allotment. This information is kept in documents that are held on computers and are processed electronically.

The WAA are only permitted to keep only such data necessary for WAA activities. The WAA keep the following data, where provided:

- Name and postal address
- Telephone number(s)
- Email address

3. Accuracy

The WAA will endeavour to maintain accurate records, however, we rely on members keeping us up-to-date.

Members can at any time ask the Secretary for a copy of their recorded data.

To request this, send an email to: bluewatersurf@btinternet.com

4. What are the data used for?

The data are only used for legitimate WAA purposes; these include but are not limited to:

- communication between committee members and other WAA members as part of the daily running of the Association and allotment site
- notification of WAA meetings and the minutes of those meetings
- allocation of allotment plots
- notification of events and activities connected with the WAA

The WAA is affiliated to The National Society of Allotment and Leisure Gardeners (NSALG). Those WAA members who have chosen to affiliate individually with the NSALG to receive liability insurance benefits provide email confirmation that their name, address and email may be shared with the NSALG. <https://www.nsalg.org>

5. What is the data NOT used for

The WAA will not deliberately disclose your data to other members or to third parties or use it on behalf of third parties. Your addresses and email addresses will not be used to send advertisements of a service or product, i.e. no "spam" will be permitted

6. Who has access to the data?

Only those who have a genuine need to use the data will be given access. The following committee members have access to all membership data:

- Chairman
- Secretary
- Treasurer
- Plot Steward

7. What happens when a member leaves the Association or gives up their plot?

The WAA does not keep data that is not needed for operation of the Association or allotment site. To comply with good financial practice and to respond to any retrospective liability issues, data will be retained for six years. After this time, it will be deleted from our records.

8. How do we protect the data?

The Data Protection Act does not specifically define the level of protection required for personal data, but rather recommends protection that is appropriate depending on the sensitivity of the data and the risks that might be incurred in the event of a security breach.

The data kept by the WAA is not classed by the Act as sensitive (examples of sensitive information are bank account details, ethnicity etc.). We therefore assume that the risks that we are exposed to are no greater than the risks of an individual providing the same data to a friend for social purposes.

9. Email usage

The Secretary is responsible for mass emails across the membership. Mass recipient emails will be sent in such a way that addresses are not exposed, i.e. blind copy (Bcc). Emails between one or more committee members need not be sent by blind copy.

10. Passwords

The data are held in documents on the officers' personal computers (see Section 6 above) and, as such, are expected to take reasonable precautions regarding security. There is sometimes a need to transmit a copy of all the data between committee members. Under these circumstances any document will be password protected and the password communicated separately. This is to mitigate the risk that the document is sent to the wrong recipient.

Mobile phones are sometimes used for email purposes. Phones are vulnerable to loss and theft. If mobile phones are to be used for WAA business they must use a PIN, fingerprint or face recognition security. Spreadsheets containing multiple records will not be kept on phones.

11. Your rights and your data

You have the right to:

- request a copy of your personal data which the WAA holds about you
- request that the WAA corrects any personal data if it is found to be inaccurate or out of date
- have your history deleted where it is no longer needed for WAA business

Any requests should be sent by email to the WAA Secretary

Who is responsible for Data Protection?

The nominated member of the WAA committee responsible for Data Protection is the Secretary
bluwatersurf@btinternet.com