

BAF Model Privacy Notice

May 2018

The European Union's General Data Protection Regulation (GDPR), which was incorporated into British law on May 25 2018, requires all organisations, whatever their size, which hold and process personal data, to do so in line with the requirements of the GDPR.

All allotment societies that are members of the Barnet Allotment Federation are responsible for managing their sites and letting plots and hence have to hold and process personal data. To assist them, the Federation has updated its advice paper on data management, in which those aspects of the GDPR that are relevant to the societies are addressed. The paper is available from the Federation website at www.barnetallolements.org.uk/wp-content/uploads/selfmanagement/Data-Protection.doc.

One duty that the GDPR imposes is that a society must tell its members what information it holds about them, why it holds it and what it does with it. This may be done by means of a **privacy notice**.

Some guidance on what a privacy notice should contain is provided by the data management paper (where it is referred to as a privacy statement). However, to help societies, the Federation has produced the model privacy notice below which, with appropriate changes, may be used as a starting point when they are producing their notices. It is based on one that Pointalls Allotments Limited, in consultation with the Federation, has written for its members. Our thanks to Pointalls for letting BAF use it.

In adapting the model notice for your society, in addition to inserting your society's name as appropriate, you might want to make other changes; for example to the list of categories of personal information held. Other changes might be required to reflect your society's operational procedures.

In the compliance section, the model notice says that no sensitive data are held. It is assumed that such data are not required in order for a society to undertake its activities. If you want to hold these you must obtain the consent of the person concerned, and the privacy notice must explain how this consent is obtained. Examples of such data might be medical history or sexual preferences.

Also in the compliance section, you will need to say how the notice is made available to members and applicants.

Hushang Balyuzi / Derek McMaster

May 2018



Colindale Allotments and Garden Association



Personal Information – Privacy Notice

Colindale Allotment and Garden Association holds and uses personal data about its members. In the context of data protection legislation it is a 'data controller'.

This privacy notice lets you know what happens to any personal data you give to us or we may collect from you. Your trust is important to us and we are committed to safeguarding your personal data.

In accordance with the General Data Protection Regulation (GDPR) which was incorporated into UK law on 25th May 2018 we are providing you with clarity on what data we have; how we use it; why we need it and who has access to it.

We are providing you with this privacy notice because:

- you are an existing member of Colindale Allotment and Garden Association and we are required to inform you of your rights relating to the personal information we hold, or
- you are making an application for an allotment and if successful will become a member of Colindale Allotment and Garden Association.

Compliance

Colindale Allotment and Garden Association is categorised as a non-profit organisation and, as we process only information relevant to managing the allotment site, there is no requirement for us to register with the Information Commissioner's Office.

The lawful basis under the GDPR which we rely on to process your personal data is known as 'legitimate interests'.

Legitimate interests applies since, as an allotment organisation, we process personal data in order to manage our site and tenancies. This is information that we require in order to undertake our role and meet the conditions of our lease with the London Borough of Barnet.

We do not collect special category or sensitive data as specified by the GDPR. Therefore we are not obliged to seek consent to hold data from our members or applicants for allotment plots.

By way of this notice we are communicating our privacy policy to both members and applicants. This privacy notice is posted on our website and copies are available at our trading shed. New applicants will be directed to this privacy notice. New tenants will be reminded of the privacy notice at the time of signing tenancy agreements.

Data protection principles

We comply with data protection law and principles, which means that your data will be:

- used lawfully, fairly and in a transparent way
- collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes
- relevant to the purposes we have told you about and limited only to those purposes
- accurate and kept up to date
- kept only as long as necessary for the purposes we have told you about
- kept securely

The information we hold about you

In connection with your membership of Colindale Allotments and Garden Association we collect, store and use the following categories of personal information about you:

- your title and full name
- your postal address
- your email address
- your home and/or mobile telephone numbers
- date of joining Colindale Allotments and Garden Association
- your rental and associated charges for your plot
- notes regarding any issues arising from your tenancy

How is your personal information collected?

We collect personal information about you from the following sources:

- your application form when applying for an allotment plot
- a formal application for membership of Colindale Allotments and Garden Association
- completed and signed tenancy agreements

How we will use personal information

We collect information in order to manage our site and tenancies. We only use your personal information for the operation of your membership and this enables us to:

- send annual invoices for rental and other related charges
- communicate with you by email, telephone and post
- keep in touch through regular newsletters which may include site news, important notifications, communications about our new products and special

offers, annual general meetings and other meetings, workshops, competitions and site activities.

Keeping your personal information up to date

If any of your personal information should change, such as your contact details or address, you should inform us as soon as possible so that we can keep our records up to date.

How we use special category or sensitive data as specified by the GDPR

We do not request or hold data or information within this category.

Data sharing

We do not share our databases with third parties.

Data security

Data is only accessible to those who need to use it to undertake our organisation's activities.

We have in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

Members' information is held securely in a password protected electronic database. Appropriate tools such as firewalls are in place and antivirus software is kept up to date.

Where we use third parties, including marketing automation platforms, for bulk email or postal communications we ensure that such suppliers are, as appropriate, fully certified and compliant with applicable privacy shield frameworks.

Information held on paper (hard copies) is kept safely and to a minimum with access limited to those who need to use it.

We have in place procedures to deal with any suspected data security breach and will notify you and the Information Commissioner's Office of a suspected breach where we are legally required to do so.

Data retention

We only hold data as long as we reasonably need it. We will retain your personal information for as long as you are a member and tenant of Colindale Allotment and Garden Association and then for a short retention period.

For applicants who withdraw from our waiting list your information will be deleted immediately from our records.

Historical records and other non essential and time expired information will be routinely deleted and destroyed.

Rights of access, correction, erasure and restriction

As a voluntary member of Colindale Allotment and Garden Association. The GDPR specifies your rights in connection with personal information. Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact: *admin@colindaleallotments.com*

Why is all of this necessary?

Colindale Allotments and Garden Association is legally obliged to comply with current data protection obligations both in relation to the GDPR and the terms of the society's lease from the London Borough of Barnet. It is required to provide you with details on the kind of information that it may be holding about you and how it is processed.

Data protection issues

If you have any questions about this privacy notice or how we handle your personal information, please contact the Committee by post through our external letterbox or at *admin@colindaleallotments.com* You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.