

## UK-GDPR Privacy Statement

### 1. Scope

This paper explains how the Guildford Allotments Co-operative Society Limited (the Society) endeavours to protect tenants' and applicants' data in context of the UK General Data Protection Regulations (UK-GDPR). For the purposes of this statement, the "Society" is deemed to address both the Guildford Allotment Co-operative Society Limited (GACSL) and the Guildford Allotment Society (GAS). The Society holds and uses personal data supplied by its tenants and applicants and, in the context of UK-GDPR, is a "data controller". This privacy statement is intended to explain what data we hold, why we need it, how we use it and who has access to it.

The paper addresses:

- An outline of the requirements of UK-GDPR
- Principles of the Society's data protection
- Information held
- Who has access to the data
- Data security and retention
- Rights of access, correction, and erasure

### 2. Requirements of UK-GDPR

The Society collects and processes personal data to manage our allotment sites, tenancies, and applications. This information is required to undertake our role and to meet the conditions of our lease with the Guildford Borough Council, the Society's constitution, and the requirements of the Society's Tenancy Agreements. Under UK-GDPR, the level of data held is categorised as "legitimate interests". The Society does not collect "special" category or sensitive data and does not use CCTV on its sites. Upon becoming aware of any breach of privacy, the Society shall inform the Information Commissioner Office (ICO) within 72 hours.

This policy statement is posted on our website. New applicants will be directed to this privacy notice and new tenants will be reminded of the policy at the time of signing tenancy agreements.

### 3. Principles of the Society's Data Protection

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 and not used in any way that is incompatible with those purposes
- kept only as long as is necessary
- kept securely

### 4. Information held

In connection with your involvement with the Society we collect, store, and use the following information about you:

- your date of application, tenancy commencement and closure
- your title and full name
- your postal address
- your email address
- your home and/or mobile telephone numbers
- your date of birth:
  - GAS tenants, i.e. all tenants pre-November 2020 provided their date of birth in order to assess whether they were eligible for an age concession. This data is still held in the Society database.
  - GACSL tenants, i.e. all tenants post-November 2020 are not eligible for an age concession but the date of birth is still required in the applicant's submission to confirm that, when a plot is allocated, the tenant satisfies the minimum age requirement. Consequently, an applicant's date of birth is held in the Society's email account but is only transferred into the Society's database if the applicant is under 18 (and over 16).

This information is provided by you at the time of your application for a plot. On taking a tenancy, further information is accumulated:

- in the case of joint tenancies, all of the above data for a joint tenant
- the number of site keys taken (and the associated key deposit paid)
- the rental and associated charges for your plot

- details of the tenant's plot (plot number, area, location)
- general notes (such as observations arising from annual inspections)
- correspondence between the Society and the tenant

It is important that 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.

## 5. Who has access to the data

Data is only accessible to those who need to use it to undertake the Society's duties, specifically:

- The Society's Committee of Management (the Committee) has access to all held data.
- Wardens and Deputy Wardens have access only to tenant names, telephone numbers and email addresses for the tenants of their site.
- Details of all tenants and associated correspondence may be submitted to Guildford Borough Council if such information is requested (in accordance with the terms of the Society/GBC lease).
- Tenant names and addresses may also be provided on request to the National Allotment Society (NAS). The Society subscribes to NAS and is insured and supported by them. In addition, NAS may also be given limited access to data if the Society calls upon them for specific professional advice, e.g. in instances of disputes.
- MCPC, providers and administrators of the Society's management database.

## 6. Data security and retention

We have in place appropriate security measures to prevent your personal information from being accidentally lost, used, or accessed in an unauthorised way. Data is held in the following locations:

- Within the Society's management database, "Colony". This is a secure, proprietary system administered by MCPC and designed specifically for the management of allotments. This contains the bulk of data.
- In the Society's Microsoft cloud OneDrive. This is primarily for copies of correspondence, minutes, procedures, and general Society administration.
- In multiple email servers. This is just email correspondence (but includes the initial application submission).
- Information held on paper is kept safely and to a minimum. This is primarily limited to the signed tenancy agreements and some correspondence.
- In order to carry out their duties, data may be held temporarily by members of the Committee on their personal or Society computers. This is necessary while processing invoices, tenancy agreements, inspection plans etc. Appropriate tools such as firewalls and antivirus software is kept up to date. Back-up devices are kept to a minimum and kept securely.
- The Society hosts a Facebook page containing submissions from tenants. By default, all such submissions are approved for publication by the tenant posting the data.
- The Society also hosts a webpage, but this does not carry any personal data. Although applications are made through the webpage, no personal data is held there.

We only hold data for as long as we reasonably need it. Data is retained as follows.

- We retain your personal information while you are an applicant or tenant.
- Tenant data is held for four years after giving up your tenancy.
- An applicant's data is deleted after the applicant withdraws their application.
- Historical records and other non-essential and time expired information will be routinely deleted and securely destroyed. Paper documentation will be shredded.

## 7. Rights of access, correction, and erasure

You have the right to:

- Request access to your personal information. This enables you to receive a copy of the personal information we hold about you.
- Request correction of the personal information that we hold. This enables you to have any incomplete or inaccurate information corrected.
- Request erasure of your personal information. This enables you to request the deletion of personal information where there is no valid reason for us continuing to hold it.

If you want to review, verify, correct or request erasure of your personal information or have any queries relating to the Society's holding of your data, please contact: The Secretary by e-mail [secretary@guildfordallotments.org.uk](mailto:secretary@guildfordallotments.org.uk).