



Offley Allotment Association Data Protection Policy

The data that members provide on their application forms are kept in documents that are held and processed electronically. This means that the Association is subject to the General Data Protection Regulation 2016 (GDPR). Under GDPR, the data that members provide are not classed as "sensitive data", and because we are a not-for-profit organisation that does not use CCTV, we do not have to register with the ICO (Information Commissioner's Office). Nevertheless, in accordance with GDPR, we have responsibilities of care to uphold. This document outlines our policies. For more information, the ICO website is here:

<https://ico.org.uk/>

What data do we keep?

We are only allowed to keep data that are necessary for our association activities. We keep the following:

- Name and postal address
- Telephone number(s)
- Email address
- Copy of Tenancy Agreement
- Payment records

Accuracy

We will endeavour to maintain accurate records, but 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 the Committee Secretary.

What is the data used for?

The data are only used for legitimate Association uses; these include:

- Communication between Committee members and other members as part of the daily running of the Association (e.g. decision-making) and site management;
- Notification of Association meetings and business, newsletters, local events, planned works, etc.;
- Ensuring payment of rent.

What is the data NOT used for?

We will not disclose your data to other members or to third parties, other than listed in this document.

Who has access to the data?

Only those who need access to the data have access. The following Committee members have access to all the member data: Chairman, Secretary, Treasurer, Site Manager.

What happens when a member leaves the Association?

We do not keep data that is not needed for operation of the Association. The data for members who leave is held for at most 6 months, after which time it will be deleted from our records. We keep the data for a short period in the event that we need to communicate with a member who has recently left.

How do we protect the data?

GDPR 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 that we keep



is not classed as sensitive, meaning that it carries the lowest level of risk if shared and is generally information that people share frequently (e.g. name, address, telephone number).

Email usage

The Secretary responsible for sending mass emails across the membership uses an email account that is password protected. Mass emails can be send blind to prevent other members of the Association (or recipients) from seeing their details. If you would like to request for your email addresses to be sent blind then please contact the Secretary.

Encryption and passwords.

The data are held in documents on committee members' personal computers which are password protected. The members are expected to take the usual precautions regarding security. The documents themselves, spreadsheets, are encrypted. There is sometimes a need to transmit a copy of all the data between committee members. Under these circumstances any document will be encrypted and the password communicated by Telephone or in a separate email. This is to mitigate the risk that the document is sent to the wrong recipient.

Mobile ("smart") phones are sometime used for email purposes. Phones are vulnerable to loss and theft so if they are used for Association business they must not contain any documents containing multiple records. Committee members are recommended to have a four digit pin code to lock their phone if it is being used on Association business.

Who is responsible for the implementation of this policy?

The Committee Secretary will be the nominated Committee member responsible for ensuring that this policy is adhered to. The current Secretary is Laurence Cowley.

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