

Cairnhill Community Allotment Association GDPR Statement

Personal Privacy Notice

Cairnhill Community Allotments 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 Cairnhill Community Allotments 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 Cairnhill Community Allotments Association.

Compliance

Cairnhill Community Allotments 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 CCIC.

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. 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 Cairnhill Community Allotments 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
- § your rental and associated charges for your plot

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 Cairnhill Community Allotments 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

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

Cairnhill Community Allotment Association will not sell or share data with any other party without the written consent of the member(s) concerned.

Scarecrow Festival

Entry information for the scarecrow festival is only held for the duration of the festival and is only used for the purposes of delivery entry packs and prizes. It is subject to the same

security as members details and is deleted as soon as the festival is finished. We never share this information with any third parties. The information we collect is

- name of entrant
- category of entrant
- postal address

PayPal

We use paypal to process payments. We will only access Paypal data if a refund is requested, and for accounting and tax purposes. We use PayPal to process personal data on our behalf.

We do not retain any financial information you may submit as part of the purchasing process.

They monitor every transaction, 24/7 to prevent fraud, email phishing and identity theft. Every transaction is heavily guarded behind PayPal's advanced encryption. If something appears suspicious, their dedicated team of security specialists will identify suspicious activity and help protect you from fraudulent transactions.

Your data as mentioned below is encrypted before transmission to prevent misuse of the transmitted data by third parties. SSL (Secure Socket Layer) is a security technology which guarantees that your personal data, including credit card information, login data and payment method, are securely transferred via the Internet. The data is encrypted so that is only readable by the PayPal payment system.

Your data which is encrypted, is as follows:

- personal data (address data, telephone number, etc.)
- login data (username and password)
- all methods of payment selected, credit card and bank account

paypal has been carefully chosen as it complies with the legislation set out in section 2.0.

- PayPal ([privacy policy](#))

Data security

Data are 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 an 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 Cairnhill Community Allotments 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

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: The Chairman by e-mail on info@cairnhillallotments.uk

Why is all of this necessary?

Cairnhill Community Allotments 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 CCIC. 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 info@cairnhillallotments.uk. 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.