



# Homes for Hooky

## Hook Norton CLT Privacy Policy

Hook Norton Community Land Trust Limited (HNCLT) needs to record certain information relating to its members and interested parties in order to carry out its day-to-day operations, to meet its objectives and to comply with legal obligations.

We are committed to processing data in accordance with our responsibilities under the 2016 General Data Protection Regulation (GDPR). To that end, we will treat information relating to all members and other interested parties with the utmost care and confidentiality.

With this policy, we ensure that we gather, store and handle data fairly and transparently and with respect towards individual rights. The administrator and any appointed representative must follow this policy, and The Board of Directors will be responsible for ensuring that HNCLT meets its legal obligations.

HNCLT agrees to comply with Article 5 of the GDPR, which requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. accurate and, where necessary, kept up to date - every reasonable step must be taken to ensure that personal data that is inaccurate, is erased or rectified without delay;
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; and
- f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures and not transferred to other countries without adequate protection.

### What data do we hold?

	Board members	Potential residents	Interested parties
<b>Name</b>	Y	Y	Y
<b>Address</b>	Y	Y	Y
<b>Email</b>	Y	Y	Y
<b>Phone</b>	Y	Y	Y
<b>Area of interest</b>	Y		Y
<b>Date of birth</b>	Y		
<b>Nationality</b>	Y		
<b>Directorships held</b>	Y		
<b>Financial background info</b>		Y	

**Where did the information come from?**

- Individuals supply the information when they express an interest in being involved with HNCLT.

**Where is the data held?**

- Data is stored on word or excel documents in Dropbox folders that are password protected and only accessible to the Administrator, Secretary and Chair.
- The Administrator also stores the information on a PC and a lap top that are both password protected.

**Who has access to it?**

- Administrator
- Secretary
- Chair

**Why do we hold it?**

We hold this information for the legitimate interests of HNCLT:

- Contacting Members about activities, events and meetings.
- Contractual requirements.

**How long do we hold the data for?**

- Member's data is held for as long as they are a member of, or have an interest in the activities of HNCLT.

**What is the process if someone wants their data amended/reduced/removed?**

- Members are asked to email [admin@hooknortonclt.org.uk](mailto:admin@hooknortonclt.org.uk) with instructions about amendments or removal of personal data.
- This information is attached as a footer to all Membership emails.
- The Administrator is responsible for making such amendments.

**How is data dealt with when it is no longer required?**

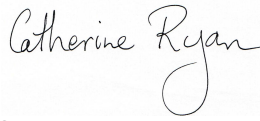
- Personal data will not be retained by HNCLT any longer than is necessary for the original purpose for which it was given, nor used for any further future undisclosed purpose, nor without the expressed permission of the person to whom that data relates.
- Electronic personal data will be permanently deleted when no longer needed.
- Paper copies of personal data will be shredded when no longer needed.

**What is the process if there is a security breach?**

- In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, HNCLT shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the individuals concerned and the Information Commissioner's Office (ICO) if appropriate. An investigation will take place to ascertain how and why the breach occurred and a process will be put in place to prevent reoccurrence.

This Policy was ratified by HNCLT Board Members on 16 September 2020

Catherine Ryan

A handwritten signature in black ink that reads "Catherine Ryan". The signature is written in a cursive style with a large, looped 'R'.

Chair, Hook Norton Community Land Trust

Tim Lunel

A handwritten signature in black ink that reads "T. Lunel". The signature is written in a cursive style with a large, looped 'L'.

Treasurer, Hook Norton Community Land Trust

This Policy shall be reviewed on an annual basis and amended as necessary