

## Data Protection Policy – Frome Area Community Land Trust Ltd.

Frome Area Community Land Trust Ltd holds data about our members, directors, supporters and other individuals for a variety of business purposes in pursuance of our objects.

This policy sets out how we seek to protect personal data and ensure that our members and officers understand the rules governing our use of personal data.

Our board of directors has overall responsibility for the implementation of this policy. Any enquiries should be sent to [info@fromeareactl.org](mailto:info@fromeareactl.org) or Frome Town Hall at the address below.

We will collect, store, use amend, share and delete personal data only in ways which protect people's privacy and comply with the General Data Protection Regulation or other applicable legislation.

We will only collect, store and use data for:

- purposes for which the individual has given explicit consent; or
- purposes that are in the CLT's legitimate interests; or
- to comply with legal obligations; or
- to protect someone's life; or
- to perform public tasks.

### Business purposes

Members/Directors	<p>In addition to data retained for the purposes of membership administration (such as when you joined), or if you applied to become a director, we will collect and use the following personal data:</p> <ul style="list-style-type: none"><li>• Name</li><li>• Address</li><li>• Email address</li><li>• Telephone number</li></ul> <p>We will collect this personal data by the following means:</p> <ul style="list-style-type: none"><li>• Membership application forms</li><li>• Director application forms.</li></ul> <p>We will use this personal data for the following purposes:</p> <ul style="list-style-type: none"><li>• Governing the CLT, for example inviting you to meetings.</li><li>• Informing you of opportunities to engage with our work, for example feeding into the design for a housing development.</li><li>• Investigating complaints.</li><li>• Improving our service to members.</li><li>• Sending out newsletters and updates.</li><li>• Asking you to complete market research surveys.</li></ul> <p>We may use Mailchimp or a similar third party provider as our email platform and your data may be passed to them for this purpose. Otherwise we will not share your data with any other organisation without your explicit consent, unless legally required or entitled to do so. We may share aggregate information on our membership without any identifying individual data, based on this data, with interested parties.</p> <p>We will retain this data so long as you are a member of the CLT.</p>
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Supporters	<p>We collect the following personal data for other individuals who may support or be interested in our work, for our newsletter:</p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Email address</li> <li>• Telephone number</li> </ul> <p>We will collect this personal data by the following means:</p> <ul style="list-style-type: none"> <li>• Website form.</li> <li>• Sign-up sheets at meetings and on street stalls.</li> </ul> <p>We will use this personal data for the following purposes:</p> <ul style="list-style-type: none"> <li>• Sending newsletters and updates on the CLT and our work.</li> </ul> <p>We may use Mailchimp or a similar third party provider as our email platform and your data may be passed to them for this purpose. Otherwise we will not share this data with any other organisation without your explicit consent, unless legally required or entitled to do so.</p> <p>We will retain this data so long as you subscribe to our newsletter.</p>
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## **Our procedures**

### **Fair and lawful processing**

We will process personal data fairly and lawfully in accordance with individuals' rights.

### **Accuracy**

We will ensure that any personal data we process is accurate, adequate, relevant and not excessive, given the purpose for which it was obtained, and that it is not held for longer than is necessary for the business purposes set out above. We will not process personal data obtained for one purpose for any unconnected purpose unless the individual concerned has agreed to this or would otherwise reasonably expect this.

Individuals may ask that we correct inaccurate personal data relating to them. If you believe that information is inaccurate you should record the fact that the accuracy of the information is disputed and inform our board.

### **The board's responsibilities with regard to personal data**

- Keeping themselves updated about data protection responsibilities, risks and issues.
- Reviewing all data protection procedures and policies on a regular basis.
- Ensuring appropriate data protection statements are attached to forms used to collect personal data, and to all marketing materials.
- Addressing any data protection queries from members, supporters and other stakeholders.
- Ensuring all systems, services, software and equipment meet acceptable security standards.
- Checking and approving with third parties that handle the company's data any contracts or agreement regarding data processing.
- Only to process personal data for the purposes set out in this policy.
- To store electronic data in secure systems, and paper records in a secure place.
- To endeavour to rectify any data breaches without delay.

### **Information requests**

You may, subject to certain exceptions, request access to information held about you. Please contact the Board if you would like to request information that we hold about you.

**Right to be forgotten**

You have the right to have your information deleted or removed within one month of a request (unless it needs to be kept for legal reasons).. Please contact the board with any such requests.

**International data transfers**

No personal data will be transferred outside of the UK unless appropriate safeguards are in place in accordance with applicable data protection laws.