

# Unity Allotment Association

## Data Protection Policy

This policy is designed to bring the Association into line with the General Data Protection Regulation which comes into force on 25<sup>th</sup> May 2018.

### Data held by the Association

The full name, address, telephone number(s) and email address of each plot holder and any person on the waiting list are held by the Association. This information is provided by the member themselves when they apply to join the Association. A note is also kept when a plot holder is a pensioner.

Plot holders' data is held in an electronic record and the paper tenancy agreements, kept by the Secretary; and in an electronic record kept by the Treasurer.

The data of people on the Waiting List is held by the Lettings' Manager and the Secretary.

The Secretary has an overview of the data that is held by each committee member and is responsible for making sure that records are kept up-to-date.

### Reasons for holding this data

The data is held so that the Trustees and Committee of the Association have a record of plot holders & can communicate with its members and so that invoices for plot rents and associate membership fees can be issued.

The data is not shared with any other party or organisation. The data is only available to Committee members as outlined above. Measures will be taken (e.g. use of BCC on emails) to ensure that the data is not shared across the Association.

### Retention of data

Data will be retained for the period of membership of the Association or while a person is on the waiting list.

On relinquishing their allotment plot or resigning from membership of the Association, all records of personal data will be deleted.

A review of the data held on members will take place at the January meeting of the Committee each year to ensure that records are accurate and appropriate information has been deleted.

### Information for plot holders and persons on the waiting list

All plot holders and persons on the waiting list will be informed about what data is held on them, why it is needed and who holds their data.

Under the GDPR they can request access to the data held on them. (Under the current regulations, the Association will have a month to comply.) They also have the right to rectification, to erasure, to restrict processing, to data portability\*, to object and the right not to be subject to automated decision-making including profiling.

All plot holders and persons on the waiting list will be asked to consent to their data being held and confirm that they have been informed of their rights under the GDPR.

\***Data portability** is the ability to move **data** among different application programs, computing environments or cloud services.