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**Unity Allotment Association**

**Data Protection/Privacy Policy**

Unity Allotment Association is committed to protecting your privacy and maintaining the security of any personal information received from you. We strictly adhere to the requirements of the data protection legislation in the UK (The GDPR). The purpose of this notice is to explain to you what personal information we collect and how we may use it.

1. **Personal Data held by the Association**

When a person applies to join the Unity Grove Allotments waiting list, either by letter, by telephone, by e-mail or via the Association’s website, they provide their full name, address, telephone numbers and email address. This information is held in both an electronic record and in paper form by the Secretary and Plot Lettings Manager.

When a person is given a plot at Unity Grove Allotments their details are transferred from the Waiting List records to the records of allotment tenancies kept by the Secretary, the Plots Letting Manager, and the Treasurer. These are in both paper and electronic form. At this stage the records also include the allocated plot number(s), together with details of any deposit paid and the annual rent due.

Only the personal data described above is collected from persons both on the waiting list and on the full record of tenancies. No other sensitive information is collected.

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.

1. **Reasons for holding this personal data**

The personal data is held to enable the Trustees and Committee of the Association to effectively manage the allotment site, so that they have a record of those on the waiting list and of plot holders and can communicate with them when required and so that invoices for plot rents and associate membership fees can be issued as necessary.

1. **Retention of data**

Personal data is retained for the period of membership of the Association or while a person is on the waiting list.

If an individual has provided their personal data for the purpose of joining Unity Grove Allotment's waiting list, it is that individual's responsibility to inform the Secretary of the association if they no longer wish to be included on the waiting list.  Once the Secretary has been informed that an individual no longer wishes to remain on the waiting list, any personal data previously provided will be removed from our data storing system.

When a member of the Association relinquishes their plot or otherwise resigns from the Association, all records of their personal data will be deleted within 30 days.

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 that all necessary information has been deleted.

1. **Information for plot holders and persons on the waiting list**

The personal data collected by the Association is not shared with any other party or organisation. The data is only available to Committee members as outlined above. Measures are taken (e.g. use of BCC on emails) to ensure that the personal data is not shared across the Association. Detailed guidance is given to Committee members as to the use and protection of waiting list and members’ personal data.

This Privacy Policy is available on the Association’s website ([www.unitygroveallotmentsharrogate.co.uk](http://www.unitygroveallotmentsharrogate.co.uk)), to which anyone applying to go on the waiting list is directed.

Under the GDPR a person can request access to the data held on them. (Under the current regulations, the Association has 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. Such requests should be addressed to the Secretary of the Association.

It should be noted that, as the Association needs the personal data described above so as to be able to administer the allotment site, any member requesting in writing the deletion of their personal data will be deemed to have relinquished their plot(s). They will then be given 30 days’ notice of the termination of their tenancy and their membership of the Association. After the end of this 30-day period their personal data will be stored for a period of 90 days before being deleted/destroyed. This is to enable the Association to deal with claims that a tenancy has been terminated unfairly.

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

1. **Interaction with the Association’s website**

The Association’s website is hosted by Wix.com. Its privacy policy can be found here:

<https://www.wix.com/about/privacy>

As well as using cookies from Association “partners” (e.g. Wix.com, the HDAF, Harrogate Borough Council), we may also embed external content from other third-party websites in our website. These might include (but are not limited to) sites such as Facebook and Twitter, whose cookie policies you can view on their own websites.

This Privacy Policy does not cover, and we are not responsible for, the privacy, information or other practices of any third parties including ones operating sites with links to unitygroveallotmentsharrogate.co.uk. The inclusion of a link on our website does not imply endorsement of the linked site by us.

We may provide you with access to third party processes permitting you to post content to your social media account(s). Any information that you provide via such a process is governed by the third party’s privacy policy, not by this privacy policy and we are not responsible for and have no control over any third party’s use of any information you provide in this way.

We are also not responsible for the collection, usage and disclosure policies and practices (including the data security practices) of other organisations, such as Facebook, Apple, Twitter, Google, Instagram, Microsoft or any other app developer, app provider, social media platform provider, operating system provider, wireless service provider or device manufacturer, including any personal information you disclose to other organisations through or in connection with the apps or website or our social media pages.

1. **CCTV**

The Association uses CCTV to monitor the operation of the site’s main gate. The Association is registered for this purpose with the Information Commissioner.

Data captured by CCTV is for the sole purpose of protecting the security of Unity Allotment, its members and their property, by monitoring legitimate entry onto the site and that the site is being properly secured by persons entering and leaving the site. The CCTV camera is positioned only on the main gate and is not for the purpose of capturing members of the public using the public highway.

CCTV data will be automatically deleted on a monthly basis or sooner if no breach of security or criminal activity is detected.

Data captured by the CCTV system is only accessible to the Chairman and will not be shared with other individual committee members or the committee as a whole unless a plot holder is seen to be in breach of Unity Grove Allotment Association rules on site security, in order that the committee can then respond to such breaches. Once the breach has been dealt with, this data will be deleted. The plot holder has the right to see their data deleted.

The Chairman reserves the right to share data captured on CCTV where such data relates to criminal activity. In this case the data will be shared with the Police. Once such data is shared with the Police, the Chairman will not store and will delete the hardcopy of this data.

1. **Information**

The data controller is the Unity Allotment Association and it can be contacted via the Secretary, whose contact details are on the Association’s website ([www.unitygroveallotmentsharrogate.co.uk](http://www.unitygroveallotmentsharrogate.co.uk/)).

The data protection officer is the Association’s Chairman who can also be contacted via the website.

If you have any questions about privacy please contact the Secretary as above.

**Unity Allotment Association**

**Policy on Photos and Videos**

Photographs, videos and other media (e.g. audio) in which individuals can be identified can be seen as **personal data** in the eyes of the law,and must be taken, stored and used in line with data protection principles.

Photographs, videos and other media:

* will only be used for the purpose for which they were taken (e.g. to publicise the activities of the Association), and no other purpose.
* will not be held longer than necessary.
* will be destroyed if the people in them ask for them to be destroyed.
* will be held, and disposed of, securely so that they don’t end up in the hands of a third party.

As a general rule, the names of the people who are photographed **will not** be included in any publicity.

**Consent**

1. **Children and vulnerable adults**
* Before photographing or filming children or vulnerable adults, their parent / guardian must be informed and their permission obtained by asking them to complete and sign the **Photo/Video consent form for children and vulnerable adults**.
* They will be told what the photographs or films will be used for. (This is particularly important if the images are to be used on the website or in social media.)
* If the permission of the parent/guardian is not obtained, photographs/videos must not be taken.
1. **Adults**
* Adults and young people will be informed before being photographed or filmed. This may be by:
* Displaying signs at the event
* Advertising in the publicity for the event (e.g. by including a statement such as “Photographs may be taken at this event and used in line with the terms of the Association's Data Protection Policy on photographs. Anyone not wishing to be included in the photographs of this event should notify the Secretary/organiser"
* If practical, making an announcement.
* They will be given the chance to opt out before photos are taken.

**Unity Allotment Association**

**Photo / video consent form for children and vulnerable adults**

**We would be grateful if you would fill in this form to give us permission to take photos/videos of your child/vulnerable adult and to use these in our printed and online publicity.**

I give Unity Allotment Association permission to take photographs and/or video of my child/vulnerable adult at the event named below.

|  |  |
| --- | --- |
| Event  |  |
| Date of event |  |
| Name of child/vulnerable adult |  |
| Name of parent / guardian |  |
| Signature of parent / guardian |  |
| Date |  |

*­­­­­­­­­­­­­­­­­­­­­­­­­­­*

|  |  |
| --- | --- |
| **Re: Image of your child** | ***Please circle your answer*** |
| May we use this image in printed publications, posters and advertising campaign materials produced by us for promotional purposes? | **Yes/No** |
| May we use this image on our website? | **Yes/No** |
| May we record this image on our promotional videos? | **Yes/No** |
| May we use this image on our social media accounts? | **Yes/No** |

*[UAA use: image number(s) \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_]*

**Unity Allotment Association**

**Data Protection Policy**

Dear Plot holder

Please find attached to this letter a copy of the Data Protection Policy of the Unity Allotment Association which we have put in place to bring us into line with the General Data Protection Regulation which comes into force on 25th May 2018.

The information held on you by the Association is your:

* Name
* Address
* Phone Number (s)
* Email address

This information will have been provided by you when you joined the Association and updated by you when you pay your plot rent each year. It is important that you check that your data is correct on your rent invoice and that you inform the Secretary of any changes to your contact details.

The data is held so that the Trustees and Committee of the Association can effectively manage the allotment site and communicate with you to keep you informed of any matters relating to the allotment site. The data will not be shared with any other party or organisation.

Currently your data is held by the Secretary, Lettings’ Manager & Treasurer.

All data held on you will be deleted when you resign from your plot. The attached policy document outlines your rights under the GDPR.

Please complete the slip below to confirm that you have read the policy and give your consent to your data being held by the Association for the purposes outlined in the policy.

Yours sincerely

I have read the Data Protection Policy of the Unity Allotment Association.

I/We agree to my/our name(s), address, phone number(s) and email address being held by the Association for the purpose of communication about matters relating to the allotment site.

Name:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Plot Number:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Signed:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Date:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Please return this slip to the Secretary,

**Unity Allotment Association**

**Data Protection Policy**

**Guidelines for Committee Members**

* Please make sure that you are familiar with the policy on data protection.
* When someone first joins the waiting list for the Association, their details will be given to the Secretary who will pass it on to the Plots Letting Manager.
* When that person takes a plot, their details will also be passed on to the Treasurer.
* When contacting a group of plot holders or persons on the waiting list by email, please ensure that you use the BCC function to ensure that recipients cannot see the email addresses of other plot holders/persons.
* Do not give the contact details of any plot holder/person on the waiting list to a third party without their permission.
* Please delete the contact details of any plot holder/person on the waiting list when asked to do so by the Secretary. This will occur when a plot holder leaves their plot or when a person on the waiting list asks to be removed from that.
* Please do not retain old spreadsheets or other documents containing personal data.
* A review of the contact details held by the Association will take place at the January committee meeting.
* Before taking photographs or videos for publicity purposes, please read and follow the relevant policy.