

Haddenham CLT Privacy Policy

July 2019

Haddenham CLT Privacy Policy

The privacy and security of your personal information is extremely important to us. This privacy policy explains how and why we use your personal data, to make sure you stay informed and can be confident about giving us your information.

This policy applies if you're a member of Haddenham CLT, a prospective or current resident, visit our website, email, call or write to us.

We'll never sell your personal data and will only share it with our external advisers and organisations we work with when it's necessary and when the privacy and security of your data is assured, or when we are required by law to share it with our regulatory body (currently the Financial Conduct Authority), the police or other official bodies.

Who Are 'We'?

In this policy, whenever you see the words 'we', 'us', 'our', 'Haddenham CLT' it refers to Haddenham Community Land Trust Limited, a community benefit society registered with the FCA under company number 7344.

If you have any questions in relation to this privacy policy or how we use your personal data they should be sent to admin@haddenhamclt.org.uk or addressed to Data Protection Officer, Haddenham Community Land Trust, Arkenstall Centre, c/o Library, Station Road, Haddenham, Cambs CB6 3SR

What Personal Data Do We Collect?

We collect different types and amounts of personal data about you depending on the specific activities you engage in with us; as at July 2019, this could be registering to become a CLT member or applying for a CLT home.

You may have given us your personal data by filling in forms on paper or contacting us via our website, by corresponding with us by phone, email or letter or by signing up in person at one of our events.

Personal Data Created By Your Involvement With Us

Your activities and involvement with us will result in personal data being created. This could include your name and basic contact details, and details of how you've helped us by being involved with our campaigns and activities. We may also keep a note of your

opinions and attitudes about Haddenham CLT, activities and interests, and your experiences of Haddenham CLT.

If you make any general complaint to or about us, we will keep full details of your name and your complaint for 6 years from the last communication we receive in respect of your complaint.

Personal Data Held In Respect Of Applicants For Membership

When you apply to become a member, you will be asked for your name, email, postal address, telephone. We are obliged by law and our Rules to hold this information on our membership database for as long as you remain a member.

If you tell us you wish to cease being a member, or on the termination of your membership for any other reason under our Rules, we will delete your contact details and all other information we hold about you apart from your name, the date you became a member and the date and means by which you ceased to be a member.

Personal Data Provided By Applicants For Homes

There is a high demand for our homes and we do all we can to ensure that they are allocated fairly to those who are most in need. Pursuant to our allocations policy (a copy of which can be downloaded from our website) if you apply for a home you will need to provide us with:

- All the details that we hold for all our members (see above);
- Proof of identity (tenancy agreement, proof of address, birth certificate);
- Personal data for the other members of your household (in relation to children, see further below);
- Information and supporting evidence about your current and previous homes;
- Information and supporting evidence about your current and previous employment (including self-employment)
- Information and supporting evidence about your connection with Haddenham and the surrounding area – this may include information about your family members and where they live now or in the past
- Financial information (proof of income and possibly capital e.g. bank statements or wage slips)
- We may also ask for and hold medical or disability information where this is relevant to the application.
- Your current and intended involvement in community organisations and activities;

We will also keep with your application papers any information collected from you at any interview held in connection with your application.

If your application for a home is successful and you become one of our residents, we will hold your application papers and details of the outcome of your application for 12 years from the end of tenancy.

If your application for a home is unsuccessful, we will let you know of the outcome and ask whether you wish to remain on our waiting list and for us to keep your application papers for up to two years in case a home comes up for reallocation. At the end of that two year period, or within six months of your decision that you do not wish to stay on the waiting list, we will destroy your application papers and all electronic records of your application.

If you appeal against our decision not to allocate you a home, we will keep all your application papers until the date 2 years after your last communication regarding our decision. We will then destroy all of your application papers but may keep a record of your name and details of the grounds of your appeal or complaint and the steps taken by us and by any external bodies for a further 4 years.

Personal Data Held About Board Members (also called Trustees)

In order to comply with our Rules and statutory and regulatory obligations and responsibilities, we collect personal data, including ‘sensitive’ personal data, from our Board members. Such data can include, but isn’t limited to:

- Name, address and full date of birth;
- Current employer and job title;
- Your current and intended involvement in other organisations and activities and any directorships or controlling interests in other businesses and organisations;
- Your skills and experience and contribution to the Board;
- Evidence of bank account for expenses payments and records of expenses claims;
- Information relating to health, racial or ethnic origin, and criminal convictions

This data will be held by us for the period of your membership of the Board and for 6 years after your resignation or removal from the Board. A record of your name and period of Board membership will be kept indefinitely.

Sensitive Personal Data

At times we’ll collect sensitive personal data for Equal Opportunities monitoring, as well as to check whether we treat everyone fairly, but this is only ever analysed at an aggregate level.

Children’s Personal Data

If you apply for a home, we will hold a record of the children in your household (including their names, sexes, ages, school/college attended and any health matters relevant to your application for housing) as part of your application papers. These details may be anonymised and used collectively for sharing with regulatory or grant-making bodies, but personal information will not be copied to any other of our databases or shared with our external advisers except for a specific purpose and with your prior written or e-mailed consent.

We sometimes take photographs of children for publicity purposes. We will always give parents and guardians the opportunity to opt out of having their photographs taken and / or published and we will not publish pictures of those under 13 without the consent of the parent, guardian, school or youth organisation.

Use Of Photographs

By attending our events you are assumed to be consenting to us using your image in any group or crowd photos or videos taken at those events. We may use the photos or videos on our website or in printed or electronic newsletters, reports or publicity materials. Please let us know at the event if you do not wish to be included in any photos or videos. We will not use photos or videos that feature you by yourself, nor will we name you in any captions, unless you have given us general or specific written consent to do so.

How We Use Your Personal Data

We'll only use your personal data on relevant lawful grounds as permitted by the EU General Data Protection Regulation (from 25 May 2018)/UK Data Protection Act and Privacy of Electronic Communication Regulation.

To the extent not already described in the policy above, personal data provided to us will be used for the purpose or purposes outlined in any fair processing notice in a transparent manner at the time of collection or registration where appropriate, in accordance with any preferences you express. If asked by the police, or any other regulatory or government authority investigating suspected illegal activities, we may need to provide your personal data to them.

Your personal data may be collected and used to help us deliver our activities, help us raise funds, or process your request for membership or application for a home. Below are the main uses of your data which depend on the nature of our relationship with you and how you interact with our various services, websites and activities.

Marketing Communications

We'd like to use your details to keep in touch about things that may matter to you, and we do not wish to send you information you don't want.

As a member of Haddenham CLT or an applicant to live in one of our homes, we may send you information based on what is most relevant to you. We may also show you relevant content online. This might be about volunteering with us, membership, events, fundraising, our home allocations/offers process and opportunities and information on new sites and campaigns.

We will never share your information with companies outside Haddenham CLT for inclusion in their marketing. If you do not wish to receive information from us you can change your mind at a later date. However, if you tell us you don't want to receive these

communications, then you may not hear about events or other work we do that may be of interest to you.

How can I change my contact preferences?

We'd love to stay in touch, but we don't want to out-stay our welcome. Choose how you would like us to get in touch with you by notifying us at admin@haddenhamclt.org.uk. For example, you can send a simple email saying, "I would like to stay in touch via your regular newsletter" and we'll keep you updated on events and news relevant to you – straight into your inbox.

We'll always act upon your choice of how you want to receive communications (for example, by email, post or phone). However, there are some communications that we need to send. These are essential to fulfil our promises to you as a member, volunteer, or applicant/resident of Haddenham CLT. Examples are:

- Confirmation of the outcomes of your application to be a Haddenham CLT resident,
- Confirmation of your membership applications,
- Membership-related mailings such as notice of our Annual General Meetings.

Membership

We use the personal data you provide as a member to maintain our membership database as required by law and our Rules, and to service your membership such as sending newsletters (subject to your contact preferences) and notices of our Annual General Meetings.

Research

We carry out research with our members to get feedback on their experience with us. We use this feedback to improve the experiences that we offer and ensure we know what is relevant and interesting to you.

If you choose to take part in research, we'll tell you when you start what data we will collect, why and how we'll use it. All the research we conduct is optional and you can choose not to take part. For some of our research we may ask you to provide sensitive personal data (e.g. ethnicity). You don't have to provide this data and we also provide a 'prefer not to say' option. We only use it at an aggregate level for reporting (e.g. equal opportunities monitoring).

Personal Data Provided By Applicants For Homes

Data in application papers is only disclosed on a "need to know" basis to those involved in the allocations process, all of whom already have duties of confidentiality as Board members of Haddenham CLT or sign an undertaking to keep all personal data disclosed in this way confidential.

Discussions of issues relating to individual applications at Board meetings are anonymised so far as possible, and the applicant's consent is obtained before any aspect of their application or their data is shared or discussed with external bodies such as the appointed housing management company. Additional copies of application papers may be printed out for interview panels but are destroyed immediately after the panel meetings.

Safeguarding Of Financial And Sensitive Data

Financial data collected on payment of the £1 membership subscription is kept secure.

Application papers including detailed personal and financial information compiled in respect of applicants for homes are kept secure in a locked cabinet.

Your privacy is important to us, so we'll always keep your details secure and make sure our data processors and professionals to whom your data is passed have promised to look after them as well.

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