



**Nadder Community Land Trust Ltd.**

**Privacy Notice**

**EDITION 1**

**1<sup>st</sup> October, 2019**

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## 1 Who we are

- 1.1 Nadder Community Land Trust Ltd. (NCLT) Is a community benefit society with charitable status, working to secure resources to invest in the long-term future of the communities in the Nadder Valley area, Wiltshire. NCLT is a community benefit society registered with the Financial Conduct Authority for England & Wales (Mutuals Registration No: 8083) and in this Privacy Notice the terms “we”, “us”, “the NCLT”, or “the Charity” all have this meaning.
- 1.2 There is a legal duty on all organisations to handle Personal Data appropriately. NCLT processes small amounts of Personal Data in pursuit of its charitable objects and for these purposes we adhere to the General Data Protection Regulation (referred to below as the “GDPR”), which came into force on 28th May 2018.

## 2 Your Personal Data

- 2.1 Personal Data is information about a living individual who can be identified directly or indirectly. This can be by the information alone or by referring to other available data which, when used in conjunction with the information, identifies the individual.
- 2.2 This Privacy Notice sets out what Personal Data we record, how we use it and whether it is shared. It also sets out the procedures we have established to enable you to exercise control over the way we manage any Personal Data which relates to you.

## 3 Why we use Personal Data

- 3.1 We use Personal Data in pursuit of our charitable objects to facilitate the small-scale development of affordable homes by the community and for the community of the Nadder Valley area. This includes managing communications with our members and supporters, maintaining membership lists, offering help to those seeking information or advice about affordable housing, negotiating and contracting with public authorities, companies and individuals supervising the delivery, sale, rental and maintenance of properties which we own, and maintaining information relating to past and potential donations.
- 3.2 Where necessary, we also use Personal Data to meet our statutory obligations.

## 4 What information we collect

### 4.1 *If you are a supporter or member of NCLT:*

- a) We will **record** your name, contact information, address, date of birth (if under 18), your shareholding and membership status. In addition, we may record details of any communications between us.

- b) We **use** this data on the basis of Legitimate Interest, to maintain records of your shareholding, communicate with you about our work and events, and keep records of your attendance or contributions at our meetings on the business of the Charity.
- c) We may **share** your name and a record of your attendance and any contributions at our meetings with other members, the Charity Commission, statutory bodies and with the public via our websites and reports. We will also, with your express consent share one or more electronic addresses, postal addresses or phone numbers at which you can be contacted.

**4.2** *If you are one of our office-holders, board members, employees or volunteers:*

- a) We may **record** your name and contact details, date of birth (if under 18), details of your work, and any communications between us.
- b) We **use** this data on the basis of Legitimate Interest (and where necessary to meet our statutory duties on the basis of Legal Obligation), to contact you in connection with your role, to maintain our accounts and record details of your role and work with us.
- c) We may **share** your contact details with the media, the public, the Charity Commission, statutory bodies and third parties where necessary to meet statutory requirements or to enable you to be contacted in connection with your work for us.

**4.3** *If you have used our services, rented or purchased a property from us:*

- a) We may **record** your name, contact details, date of birth (if under 18), details of our service to you or any transactions between us and related payments. We may also record any communications between us.
- b) We **use** this data on the basis of Legitimate Interest (and where necessary to meet our statutory duties on the basis of Legal Obligation) to communicate with you in connection with our service to you or the property you have rented or purchased from us, to maintain our accounts, deliver the service or product which you have requested, or meet our contractual obligations.
- c) We will **not share** your Personal Data for any other purpose without your express consent.

**4.4** *If you have made a donation to us:*

- a) We may **record** your name, contact details, date of birth (if under 18), details of your donation and if you completed a Gift Aid declaration we will record information required by HMRC. We may also record any communications between us.
- b) We **use** this data on the basis of Legitimate Interest (and where necessary to meet our statutory duties on the basis of Legal Obligation ) to maintain our accounts and acknowledge your donation. We may also contact you by email or post about other ways in which you can support our work unless you ask us not to.
- c) We will **not share** your Personal Data for any other purpose without your express consent.

**4.5** *If you have visited our website or used our services:*

- a) We may **record** pseudonymised data relating to your activity for our own statistical purposes and, with your consent we will set cookies on your machine in accordance with our Cookie Policy (see *Section 8 Our website and use of cookies*).
- b) We **use** this data on the basis of Legitimate Interest to ensure that your experience, and those of others visiting our website is as straightforward as possible.
- c) We will **not share** your Personal Data for any other purpose without your express consent.

4.6 *If you have indicated your wish to be kept informed of our work:*

- a) We may **record** your name and contact details together with any correspondence between us. We may also record your date of birth (if under 18) and other relevant information which you entered at the time of registration.
- b) We **use** this data on the basis of Consent to send you newsletters and other information relevant to our work and connect you with other organisations which can help you achieve your objectives.
- c) We may with your express consent **share** your contact details with other organisations which have similar objectives where they may be able to assist you. In the unlikely event that we wish to share or use your Personal Data for purposes outside those set out in this Privacy Notice, we will provide you with a new Privacy Notice explaining this new use and will seek your prior consent in advance of the new processing.

4.7 *If you represent a supplier, public body or other organisation relevant to our charitable objects*

- a) We may **record** your name and contact details together with any correspondence between us and details which are relevant to our charitable purposes. We will obtain this information directly from you, from the organisation which you represent or from other publicly available sources.
- b) We **use** this data on the basis of Legitimate Interest and solely in pursuit of our charitable objects.
- c) We may with your express consent share publicly one or more electronic addresses, postal addresses or phone numbers at which you can be contacted.

4.8 *If you have registered to attend one of our events or meetings:*

- a) We may **record** your name and contact details. We may also record your date of birth (if under 18) and other relevant information which you entered at the time of registration. We may also, with your express consent, record “special categories” of data (as defined in the GDPR) including details of allergies and special health or access needs relevant to your attendance.
- b) We **use** this data on the basis of Legitimate Interest (and with your express consent in the case of any “special categories” of data) to ensure that our preparations have due regard for your needs and vital interests.
- c) We may **share** this information with others who are involved with the management of the event or meeting which you are attending.

4.9 *If you have participated in conversations on social media websites which we administer*

- a) We may **record** your name, contact details and date of birth (if under 18), together with your social media posts.
- b) We **use** this data on the basis of Legitimate Interest (and where necessary to meet our statutory duties on the basis of Legal Obligation) in accordance with that website’s terms of use.
- c) We may **share** publicly your email address and contact details alongside any social media posts which you have made in accordance with the website’s terms of use.

## 5 How we process Personal Data

- a) In all cases we process the minimal amount of Personal Data necessary for the purposes described above.

- b) Your Personal Data will be processed by our volunteers and employees. It may also be processed by suppliers providing supporting services (such as printing, specific promotional campaigns and cloud-based computing services).
- c) Members our charity may be based overseas as well as in the UK. As a result, to fulfil the purposes set out above your Personal Data may be used or accessed by our volunteers who are based outside the European Union in connection with their work for NCLT.

## 6 How long we keep Personal Data

- 6.1 We will keep your Personal Data no longer than necessary to fulfil the purposes described in this Privacy Notice, except that where the impact on your privacy is minimal, we may keep your Personal Data for longer periods to maintain our historical records and support our heritage.

## 7 Your rights over your Personal Data

- 7.1 Unless subject to an exemption under the GDPR, you have the following rights with respect to your Personal Data: -
- a) the right to request a copy of personal data which we hold about you;
  - b) the right to request that we correct any personal data if it is found to be inaccurate or out of date;
  - c) the right to request your personal data is erased where it is no longer necessary for us to retain such data;
  - d) the right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
  - e) the right to object to the processing of personal data, (where applicable); and
  - f) the right to lodge a complaint with the Information Commissioners Office.
- 7.2 Where you need to exercise one of the rights shown above, please email or write to us at the address in *Section 10 How to contact us* below.
- 7.3 You also have a right “to be forgotten” and have your Personal Data removed. Please be aware however that if you exercise this right it may affect our your membership or our ability to provide services to you, to receive donations from you or to inform you of events or news of interest. If you act as one of our members, trustees, employees, suppliers or volunteers it may only be possible for you to exercise this right over Personal Data :
- a) which is no longer needed for the purpose for which it was originally recorded; and
  - b) which we are not legally required to retain.
- 7.4 Where you wish to exercise the right to be forgotten, please email or write to us at the address in *Section 10 How to contact us* below. We will contact those other individuals or organisations with whom we have specifically shared your Personal Data (see *Section 4 What information we collect* above), instruct them to remove your Personal Data from their records and request from them confirmation that this has happened. To the extent that the law allows, we will ensure your Personal Data is no longer shared with any other person or organisation, although we may not be able to contact the media, the public or third parties who have in the past viewed or copied your Personal Data by virtue of their access to our websites or other publicity materials.

## 8 Our website and use of cookies

- 8.1 Our websites use cookies – small text files that are placed on your machine to enable us to provide information to you, to support navigation through the site, to enable other functions which you may select and to provide anonymised tracking data to third party applications such as Google Analytics.
- 8.2 Our websites will always inform you where cookies are employed and our use of cookies is governed by our Cookie Policy, which you may view on our websites. We will only set cookies on your machine if you accept our Cookie Policy and website terms of use.
- 8.3 Our use of cookies is intended to make your browsing experience better, but you may prefer to disable cookies on your machine or to remove cookies which you have previously approved. Further information about how to do this can be found at [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org). You can set your browser not to accept cookies and the above websites tell you how to remove cookies from your browser. However in this case certain functions of our websites may not work.
- 8.4 Our websites may contain links to other websites, which are outside our control. You should be aware that this Privacy Notice applies only to our own websites so when you click on such links your use of other websites will be governed by their own terms of use and privacy policies.

## 9 Changes to our privacy policy

- 9.1 We keep our privacy policies under regular review and we may make updates to this Privacy Notice accordingly.
- 9.2 This Privacy Notice was last updated on **1<sup>st</sup> October, 2019**

## 10 How to contact us

- 10.1 If you have a concern or query relating to our use of your Personal Data or this Privacy Notice, please in the first instance contact our Secretary, whose contact details may be found on our website at : <https://www.naddercommunitylandtrust.org>. Alternatively, please email [info@naddercommunitylandtrust.org](mailto:info@naddercommunitylandtrust.org).
- 10.2 If you are not happy with our response, or you believe that your data protection or privacy rights have been infringed, you can contact the UK Information Commissioner's Office which regulates and enforces data protection law in the UK. Details of how to do this can be found at [www.ico.org.uk](http://www.ico.org.uk), or you can contact the Information Commissioners Office on 0303 123 1113 or via email [ico.org.uk/global/contact-us/email/](mailto:ico.org.uk/global/contact-us/email/) or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.