

Lynwood Allotment Association – Privacy Policy

24 May 2018

1. This policy governs the manner in which we collect, hold and use personal data, being any information relating to an individual who can be directly or indirectly identified from it. It is intended to ensure our compliance with the General Protection Regulation (EU 2016/679) and applicable ICO guidance on the subject.
2. All LAA Committee members and any other members who may process personal data on its behalf must be made aware of this policy.
3. Personal data collected by the LAA must be processed in accordance with this policy and the associated Data Protection Privacy Notice set out below which is to be taken as forming part of this policy.
4. The LAA Committee considers that it is justified in processing the personal data likely to be processed by it on the basis of legitimate interest. In summary, the basis for this (its legitimate interest assessment) is as follows:
 - a. Processing the personal data enables the LAA to be effectively administered in the interests of its members and the wider community;
 - b. It is necessary to do so for the effective administration of the LAA;
 - c. The personal data likely to be processed is mostly that of members of the LAA, is not particularly sensitive or private, processing of it is unlikely to have any significant impact and its members would expect it to use the data in this way; personal data of non-members is also only processed in relation to persons who either correspond with the LAA or are invited onto the LAA site by members, who are there on official business or who enter the site unlawfully;
 - d. The attached Privacy Notice explains the position to all concerned.
5. The LAA Secretary will be responsible for holding all personal data collected by the Association. Where this is stored electronically, this will be on a computer with the latest security software installed and where practical it will be encrypted.
6. Copies of any consents obtained from data subjects must be kept for as long as they remain valid.
7. Any request for disclosure of personal data (which is known as a subject access request) must be dealt with without undue delay and within a month.
8. Any breach of this policy must be recorded. In the case of a personal data breach, that is to say where any personal data is lost, destroyed, corrupted or improperly disclosed, then this must be reported to the ICO within 72 hours if it is likely to result in a risk to people's rights and freedoms (i.e. likely to lead to serious economic or social disadvantage). If there is a high risk to any person's rights and freedoms, the individual concerned must also be informed of the breach.
9. This policy will be reviewed by the LAA Committee at least once a year.

Data Protection Privacy Notice

1. Who we are and what we do:

Lynwood Allotment Association (LAA) is a voluntary association of allotment plot holders at the allotment site on Lynwood Road. It manages that allotment site through an elected members' committee (the LAA Committee).

2. Information we collect:

To manage the LAA we need to collect some personal information, including names and contact details in particular. These may be amended as necessary when notified by you.

Who we collect from	What we collect	How we collect it
Members and their associates	Your and your associate's name, email address, postal address, telephone number(s)	Plot tenancy agreements, invoice records, Membership Record Form and notification of changes by you.
Non-members	Names and contact details	Letters, emails, telephone conversations, notes and other records
Members and non-members	Any other personal information disclosed	Letters, emails, telephone conversations, notes and other records of meetings and events
	Photographs	CCTV cameras on site and photographs taken on site

3. How we use your information:

We may use your information for our legitimate interests in managing the LAA. Our legitimate interests are explained below, alongside examples of how your information may be used for these purposes.

Purpose	Examples
To manage our relationship with you.	In the case of members and their associates, this includes sending you invoices and engaging with you more generally to manage rights and obligations relating to your Tenancy Agreement.

	It also involves disclosing membership details to certain organisations that we have a relationship with for the purposes of managing the LAA and its allotments (see next section for more details).
To keep members informed and publicise the activities of the LAA	By sending out newsletters and other information (including through our website), for example, information concerning the AGM, our services and changes to our terms, conditions, and policies
Legal and regulatory	<p>For audits, to verify that our internal processes function as intended and are compliant with legal, regulatory, or contractual requirements.</p> <p>In rare circumstances, we may have to use and disclose personal information in order to exercise or protect legal rights or defend against legal claims under applicable law.</p>

4. Who may receive your information:

Here we draw attention to other entities who may receive your information when it is shared by us.

Esher and Molesey Garden Society (EMGS).	Full Members of LAA are automatically members of the EMGS. Names of Members are supplied to the EMGS to allow them to benefit from the services offered at the Trading Post and to receive information and Newsletters.
The National Allotment Society (NSALG).	LAA is a member association of The National Allotment Society (NSALG). In accordance with their Rule 7 (Clause 14) we are required to provide NSALG with a complete list of current members of LAA. As a Co-operative Society NSALG may be audited by the Financial Conduct Authority and therefore be obliged to provide details of members. All information provided is for NSALG's records only and will not be disclosed to a third party without prior authorisation.
Legal and administrative obligations	<p>We may use and disclose your personal information as necessary or appropriate, especially when we have a legal obligation or legitimate interest to do so:</p> <p>Fraud prevention: We may use and disclose the information we collect from members as we believe necessary to investigate, prevent, or respond to suspected illegal or fraudulent activity or to protect the safety, privacy, rights, or property of us, our members, or others.</p> <p>Law enforcement purposes: If requested or required by government authorities such as law enforcement authorities, courts, regulators, or otherwise to comply with the law (which may include laws outside your country of residence), we may have to disclose information we have about our members. We also may use and disclose information</p>

	<p>collected about members in order to exercise or protect legal rights or defend against legal claims.</p> <p>If LAA ceases to exist, for example, by transfer of the lease or reversion of management to Elmbridge Borough Council we may, in this unlikely event, disclose, or transfer your personal information.</p>
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4. Access to information and correction:

Contact details for members and associates are included in annual invoices for renewal of membership.

If you would like to review, correct, update, or delete personal information please contact The Secretary, LAA.

5. Cookies:

Cookies which have been categorised by BT as strictly necessary using the ICC guide of cookie categorisation are detailed in our Cookies |Policy which is as follows:

The Community Web Kit has been developed by BT to help community groups build and maintain their own websites. However responsibility for the content of these websites lies with the organisation which builds them and not with BT. To provide this facility the website uses the following cookies which have been categorised by BT as ‘strictly necessary’ using the ICC UK guide of cookie categorisation.

- [ASP.NET SessionId](#): This is the ASP.NET framework ‘session cookie’. Please note that because BT doesn’t control the content of this website it is possible that other cookies will also be used, these are the responsibility of the organisation the site represents and not BT.

LAA does not use any other cookies.

6. Data retention & security:

We seek to use reasonable organisational, technical, and administrative measures to protect your personal information within our organization from loss, misuse, unauthorized access or disclosure, alteration and/or destruction. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure contact The Secretary, LAA.

We will retain your personal information for as long as needed or permitted in light of the purposes for which it was obtained. The criteria used to determine our retention periods include the length of time we have an ongoing relationship with you and provide our services to you, our legal obligations or whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).

7. Cross-border transfers:

We do not envisage any requirement to transfer your information across national borders.

8. Third-Party Services:

We are not responsible for the privacy practices of third parties, including websites other than our own to which we provide links.

9. Policy updates:

This policy may change over time. Any changes will become effective when we post the revised Privacy Policy on our website.

10. How to contact us:

If you wish to contact us about any aspect of this notice, please contact the LAA Secretary by email at grahamhowardhr@aol.com

Lynwood Allotment Association Committee
24 May 2018