



**Queen Camel Community Land Trust Ltd.
(QCCLT)**

**UK GENERAL DATA PROTECTION REGULATION
(GDPR)**

(Derived from the EU GDPR of 2018)

Privacy Policy

for

**QCCLT members/employees/householders at Roman
Way/Users at the Old School/Enquirers**

**Adopted by the Board on behalf of QCCLT
on Monday, 14th June 2021**

Our contact details

Postal Address: the Old School, High Street, Queen Camel, Yeovil, Somerset,
BA22 7NH

Website: qcclt.co.uk

E-mail: admin@oldschoolqueencamel.org.uk

The UK GDPR requires that Personal Data is protected. The following should be in place to ensure this protection is given:

- **A Personal Data Protection Policy (Article 24)**
A data protection policy that sets out how an organisation protects Personal Data.

Personal Data (PD) means any information relating to an identified or identifiable natural person (**Data Subject**). An identifiable natural person is one who is alive and can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identify of that natural person.

- **A Privacy Notice (Articles 12, 13, and 14)**
A privacy notice that is a public statement of how an organisation applies and complies with the GDPR's data processing principles.
- **An Employee Privacy Notice (Articles 12, 13 and 14)**
A requirement to be more transparent and open than ever before about the employee-related data processed. It is a core GDPR principle for employers to process HR (human resources) related data in a fair and transparent way.
- **A Data Retention Policy (Articles 5, 13, 17, and 30)**
A data (i.e., records) retention policy that outlines the protocol for retaining information. It is important that we only retain data for as long as it is needed.
- **A Data Retention Schedule (Article 30)**
A data retention policy that defines how long data items will be kept, with disposal guidelines on how the data should be discarded.
- **Data Subject Consent Forms (Articles 6, 7, and 9)**
Explicit consent is one lawful basis for processing Personal Data. It can also legitimise the use of **Sensitive Personal Data**.

Sensitive Personal Data means Personal Data relating to but not limited to: race, ethnic background, political opinions, religious beliefs, trade union membership, genetics, biometrics (where used for identification), health, or gender orientation or history. QCCLT will hold Sensitive Data only where explicit consent has been given, e.g. employment requirements, Equal Opportunities reporting but that would only ever be analysed at an aggregate level.

QCCLT is committed to protecting and respecting your privacy. This Policy sets out the basis on which any PD we collect from you, or that you provide to us, will be processed by us, so that you can be confident about giving us your information.

PERSONAL DATA THAT QCCLT PROCESSES

All the PD that we hold is either obtained directly from you or automatically generated from the interactions that we have with you. We do not collect PD from any other source.

What PD we hold

- *Information you give us:* You may give us PD by filling in forms, corresponding with us by printed letter, telephone, e-mail or otherwise, meeting with a Board member, becoming an employee, a QCCLT member or a volunteer, donating or subscribing to a share offer, attending a QCCLT organised event, participating in a survey or carrying out any other activity where you have contact with us. The information you give us will usually include your name, address, e-mail address and/or telephone numbers, as well as other information.

The other information could be details of how you have helped us by volunteering or being involved with our fund-raising campaigns and open events. We may also keep a note of your opinions and attitudes about QCCLT activities and interests, and your experiences of QCCLT.

We will keep records of donations, of when and how much and whether they were linked to a particular purpose, and how they were paid, i.e., cheque, cash, BACS and also whether they were gift-aided.

If you are or have been an employee or a volunteer, then we may collect additional PD (e.g., references, emergency contacts, medical conditions, etc.). You will be asked to sign acceptance for this information to be held and it will be retained for legal or contractual reasons for a period of 6-years after you stop working with us.

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

- *Information we collect about you.* In addition to the foregoing *Information you give us*, we may collect the following information automatically when you visit the Old School and when you use the Wi-Fi internet when at the Old School:
 - images captured on CCTV – see CCTV notice below.
 - technical information, including the internet protocol (IP) address used to connect your computer to the internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform.
- *Information we receive from other sources.* We may receive information about you from third parties (including, for example, the housing organisation with which we have a partnering arrangement for the purpose – and no other – of confirming the stated Local Connection of the applicant).

Personal Data Held About Board Members

In order to comply with our Rules and statutory and regulatory obligations and responsibilities, we collect PD, including 'Sensitive' PD, from our Board members. Such data can include, but is not limited to:

- Name, address and date of birth;
- Current employer and job title;
- Current and intended involvement in other organisations and activities and any directorships or controlling interests in other businesses and organisations;
- Skills and experience and contribution to the Board;
- Evidence of bank account for expenses payments and records of expenses claims;
- Opinions and attitudes about QCCLT and personal activities and interests;
- information relating to health and criminal convictions

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

How we use your PD

We will only use your PD in a manner that is appropriate considering the basis on which that data was given or collected. This will be primarily to:

- reply to your enquiries and to send updates on our work or changes to our services; and
- carry out obligations arising from any contracts or agreements entered into with us and to provide the information and services that are required by such contracts or agreements, e.g., confirmation of membership applications and membership-related mailings including notice of Special and Annual General Meetings.

When we share your PD

We will share your PD with third parties only in the following circumstances:

- you have provided your explicit consent for us to pass data to a third party;
- QCCLT is required by law to share your data;
- QCCLT is required to supply your data to the bank, police or to a regulatory or Government organisation for the continued functioning of QCCLT.
- Where our website service provider and CCTV specialist have access respectively to the website and CCTV – see under Website and CCTV below.

How we Store and Dispose your PD

Your printed PD is securely stored in a locked cabinet at the Old School. Disposal is by shredding or burning with the timescales are in accordance with legal, contractual, membership or any other written regulation that governs our operation.

Electronic information that you provide to us is stored on password protected computers and secure servers. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your PD, we cannot guarantee the security of data transmitted to our site; any transmission is at the sender's risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Use of Photographs & Videos

We sometimes take photographs/videos for historical and publicity purposes. This may include at events that we organise. By attending our events you are assumed to be consenting to us using your image in any group or crowd photographs or videos taken at those events. We may use these on our website or in printed or electronic newsletters, reports or publicity materials. We will not use photographs 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. We will not use photographs or videos of identifiable children (the legal definition of a child is up to age 18) without the express permission of their parent or guardian (up to age 16) and from the child (aged 16-17). Please let us know at the event or otherwise if you do not wish to be included in any photographs or videos.

Website Policy

We operate two websites:

1. www.qcclt.co.uk, which provides information about QCCLT including our policies and procedure documents; and
2. www.oldschoolqueencamel.org.uk, which provides information about the Old School.

If you visit and browse these websites, you are agreeing to comply with and be bound by the following terms and conditions of use, which together with our privacy policy govern QCCLT's relationship with you in respect of these websites. If you disagree with any part of these terms and conditions, please do not use our websites.

- The content of the pages is for your general information and use only. It may be subject to change without notice.
- The websites use cookies to monitor browsing preferences. If you do allow cookies to be used, the following personal information may be stored by us for use by third parties:

Cookies are files with a small amount of data that is commonly used as an anonymous unique identifier. These are sent to your browser from the website that you visit and are stored on your computer's hard drive.

Our website uses these "cookies" to collection information and to improve our Service. You have the option to either accept or refuse these cookies and know when a cookie is being sent to your computer. If you choose to refuse our cookies, you may not be able to use some portions of our Service.

- Neither we nor any third party provide any warranty or guarantee as to the accuracy, timeliness, performance, completeness or suitability of the information and materials found or offered on these websites for any particular purpose. You acknowledge that such information and materials may contain inaccuracies or errors and we expressly exclude liability for any such inaccuracies or errors to the fullest extent permitted by law.
- Your use of any information or materials on these websites is entirely at your own risk, for which we shall not be liable. It shall be your own responsibility to ensure that any products, services or information available through these websites meet your specific requirements.
- These websites contain material which is owned by or licensed to us. This material includes, but is not limited to, the design, layout, look, appearance and graphics. Reproduction is prohibited other than in accordance with the copyright notice, which forms part of these terms and conditions.
- All trademarks reproduced in these websites, which are not the property of, or licensed to the operator, are acknowledged on the website.
- Unauthorised use of these websites may give rise to a claim for damages and/or be a criminal offence.
- From time to time, the websites may also include links to other websites. These links are provided for your convenience to provide other information. They do not signify that we endorse the website(s) and we have no responsibility for the content on them. If you follow a link to any of these websites, please note that they have their own privacy policies for which we have no responsibility or liability. Please check these policies before you submit any PD to these websites.
- Your use of these websites and any dispute arising out of such use of the websites is subject to the laws of England.

Log Data

Whenever you visit our websites, we collect information that your browser sends to us that is called Log Data. This Log Data may include information such as your computer's Internet Protocol ("IP") address, browser version, pages of our Service that you visit, the time and date of your visit, the time spent on those pages, and other statistics.

Website Service Providers

We may engage a third-party for the following:

- To facilitate our website service;
- To provide the website service on our behalf;
- To perform website service-related services; or
- To assist us in analysing how our website service is used.

We want to inform you that the third party may have access to your PD. The reason is to perform the tasks assigned to them on our behalf. However, they are obligated not to disclose or use the PD for any other purpose.

Website Security

We value your trust in providing us your PD, thus we are striving to use commercially acceptable means of protecting it. However, no method of transmission over the internet, or method of electronic storage, is 100% secure and reliable, and we cannot guarantee its absolute security.

Website Information Collection and Use

For a better experience while using our service, we may ask you to provide us with certain personally identifiable information, including but not limited to your name, telephone number, and postal address. The information that we collect will be used to contact or identify you.

CCTV at the Old School

We are using CCTV as a tool to act as a deterrent to anti-social and criminal activity and so reduce the risk of harm to people and damage to property. The footage will be used in the event of an incident of harm to a person or people and in the event of damage caused to property. It may also be used as evidence by the police and courts to bring about a successful prosecution.

We have displayed public notices that state CCTV is in operation for the purpose of crime prevention and public safety.

The CCTV footage will be accessible to QCCLT's Board members and Administrator and, where illegal activity is involved, to the Police.

Physical tapes will be stored in a locked cupboard, and digital files will be saved in an electronic folder that is subject to access controls.

The tapes and electronic data will be kept for no longer than 6-weeks unless required to be used as evidence for investigations or prosecution of anti-social or criminal activities. Tapes will be shredded and electronic data will be deleted.

Disclosure: All recorded data will be treated as confidential information and will not be disclosed to anyone other than those who need access to it because of people abuse, anti-social and crime prevention and/or prosecutions regarding criminal activity. There are four exceptional circumstances to the above permitted by law:

- Where we are legally compelled to disclose
- Where there is a duty to the public to disclose
- Where disclosure is required to protect our interest
- Where disclosure is made at your request or with your consent

Your data protection rights

Under data protection law, you have rights and these include:

- **Your right of access** - You have the right to ask to view your PD that we hold.
- **Your right to rectification** - You have the right to ask us to rectify PD you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Your right to erasure** - You have the right to ask us to erase your PD in certain circumstances.
- **Your right to restriction of processing** - You have the right to ask us to restrict the processing of your PD in certain circumstances.
- **Your right to object to processing** - You have the the right to object to the processing of your personal information in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you. Our contact details are on the front cover if you wish to make such a request.

Your right to complain

If you have any concerns about our use of your PD, you can make a complaint to us through the address details on the front cover. You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office
Wycliffe House, Water Lane
Wilmslow, Cheshire
SK9 5AF

Helpline number: 0303 123 1113
ICO website: <https://www.ico.org.uk>