

# Wellesbourne Allotments Association & GDPR

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On the 25th May 2018, the European Union General Data Protection Regulation (GDPR) act becomes law in the UK and all personal data being held by entities (businesses, government, charities, organisations etc.) must be minimal for purpose of use, managed to ensure it is being processed correctly, protected from misuse and held in full accordance with your knowledge. WAA is no exception and this communication is to explain what data we hold about our plot holders and state our commitment to how we will manage your data (termed data processing).

## Our Legal Obligations

The best source of information regards GDPR is held by the Information Commissioner's Office (ICO), the actual UK regulators. There are many pages of information on Google, but the [ico.org.uk](http://ico.org.uk) is the single source of truth for all.

Paraphrasing their instructions, WAA is legally obliged to:

- Process all personal data lawfully, fairly and in a transparent manner
- To communicate with our plot holders what information we hold and why we hold it
- Keep any personal data held to an absolute minimum, and specific for purpose only
- To have your express permission to hold such data about you unless there are contractual or legal reasons to hold such information
- Hold your data securely and safely, whether it is in paper or digital format
- Ensure it is accurate, current and eventually destroyed/deleted once we have no further use for it
- Restrict the information accessibility to only those who require to see it
- Declare if and how we would share your data with any 3rd parties (we don't)

## What Data WAA Hold About You – Key Data

In order to manage the letting of allotments effectively and correctly, WAA hold six pieces of key data about you in our records. ***This is the minimal amount of information which is necessary for the committee to manage the allotment site effectively.*** In compliance with the law, because this information supports the rental contract between yourselves and WAA, our processing of the minimal data does not require your pre-consent (i.e. opt-in). The key data we hold is as follows:

- Your name(s) (mandatory information)
- Your address (mandatory information)
- Your telephone number(s) (mandatory information)
- Your email address (requested information)
- Your plot number (mandatory information)
- Date which your rent was paid (incidental information)

These details are sufficient to ensure that we can validate your current plot rental agreements, contact you regards issues with your plot, to share committee communications, WAA newsletters and to pass on details about important events such as the AGM or the threat of development at the site. WAA would fail to correctly manage the site for you with any fewer items of data.

### **General Data Which WAA Holds**

In addition to the above, WAA hold other incidental information relating to the running and maintenance of the whole site. Such data includes committee notes regards condition & running of the site infrastructure, the allotment shop and communications with the land agents/owners. Financial information and banking communications are also retained for auditing purposes.

Important to highlight is that through this ongoing management activity, information or communications with you about the maintenance of your plot may be retained. This would not necessarily be applicable for all plot holders.

Other data which we may hold is specific to digital and physical media i.e. photographs from WAA events, audio or video recordings (from either WAA events or via external media organisations), or from press cuttings. For this type of data, we will endeavour to seek your approval to hold it wherever possible. You would normally be expected to give your permission prior to being interviewed by any media organisations.

Specifically in relation to photographs or recordings, WAA will post clearly visible signs at events advising that photography, audio recording or filming is taking place and that it is possible that you could be captured in them if you proceed past that point. Please note that WAA cannot readily control photography taken by individuals for their personal use.

Finally, WAA wish to make it explicitly clear that we *never* share your details with any 3rd parties.

### **Deletion of Data**

If and when you have given up your plot(s) and are no longer associated with the

allotment site, going forwards the WAA committee will retain the key details for 12 months. After that time period, WAA will delete the key data fields from our records to ensure compliance with the law unless you give us express permission to retain them for either future historical reference, or to receive information regards the events at the allotment site. The 12 months data retention period will be dated from any of the following events:

- following your giving notice to quit, the date of your handover back to the committee
- following your failure to pay your annual rent, the date on which it is established by the committee that you have relinquished your plot
- should you cease maintenance of your plot and, after failure to communicate with the committee, the date of which your plot is deemed to be relinquished
- for any other reason which you are evicted from the site by the committee, the date of which your plot is deemed to be relinquished

### **Closing Comments**

We hope that this information has been of use and clearly explains both WAA's commitment to you, and how your data is used.

To ensure that WAA remain compliant, please ensure if your details change that you inform the committee so that we can maintain accuracy of retained data. If you have concerns or queries about the data we hold on you, please raise this with the committee.

WAA Committee – May 2018