

Aldingbourne, Barnham and Eastergate Community Land Trust

PRIVACY NOTICE

We are committed to respecting your privacy. This notice is to explain how we may use personal information we collect before, during and after your membership with us. This notice applies to you if you have registered to become or are a member of our community benefit society or complete a survey distributed by us (or on our behalf). This notice explains how we comply with the law on data protection and what your rights are. For the purposes of data protection we will be the controller of any of your personal information.

References to **we**, **our** or **us** in this privacy notice are to the Aldingbourne, Barnham and Eastergate Community Land Trust (ABE CLT).

We have not appointed a Data Protection Officer to oversee our compliance with data protection laws as we not required to do so, but our Treasurer has overall responsibility for data protection compliance in our organisation. Contact details are set out in the "Contacting us" section at the end of this privacy notice.

(a) PERSONAL INFORMATION WE MAY COLLECT FROM YOU

When you become a member, you will provide us with **personal information** about you, such as information regarding your:

- personal contact details that allows us to contact you directly such as name, title, email addresses and telephone numbers;
- date of birth;
- your contact preferences so that we know whether and how we should contact you.
 - (b) WHERE WE COLLECT YOUR INFORMATION

We typically collect personal information about our members when you apply to become a member of ABE CLT. We will do this by asking you to complete and return a membership form.

(c) USES MADE OF THE INFORMATION

The table below describes the main purposes for which we process your personal information, the categories of your information involved and our lawful basis for being able to do this.

Purpose	Personal information used	Lawful basis
To administer any membership you have with us and managing our relationship with you,	All contact and membership details, and contact preferences.	This is necessary to enable us to properly manage and administer your membership with us.
To send you information which is included within your membership, including notices of general meetings of the members and any members newsletters	Contact and membership details.	This is necessary to enable us to properly manage and administer your membership with us.
To send you information we think you might find useful or which you have requested from us, including information about membership and events	Contact details and contact preferences.	Where you have given us your explicit consent to do so.
To answer your queries	Contact details	We have a legitimate interest to provide complaint handling services to you in case there are any issues with your membership.
Retention of records	All the personal information we collect.	We have a legitimate interest in retaining records, we need to retain records in order to properly administer and manage your membership and run our community benefit society
For the purposes of promoting the ABE CLT	Images in photographic form.	Where you have given us your explicit consent to do so.
For the purposes of keeping and maintaining a list of people expressing an interest in local needs housing	Personal information including financial and housing circumstance	Where you have given us your explicit consent to do so. To inform ABE Community Land Trust Housing Allocation Policy and procedures

For some of your personal information you will have a legal, contractual or other requirement or obligation for you to provide us with your personal information. If you do not provide us with the requested personal information we may not be able to admit you as a member or we may not be able to properly perform our contract with you or comply with legal obligations and we may have to terminate your membership. For other personal information you may not be under an obligation to provide it to us, but if you do not provide it then we may not be able to properly perform our contract with you.

Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us as described in the "Contacting us" section below.

Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain member benefits to you.

(d) DIRECT MARKETING

Email marketing: from time to time, we may contact you by email with information about ABE CLT events we believe you may be interested in.

We will only send marketing messages to you in accordance with the marketing preferences you set. You can then let us know at any time that you do not wish to receive marketing messages by emailing us at:

DISCLOSURE OF YOUR PERSONAL INFORMATION

We share personal information with the following parties:

- Police, law enforcement and security services: to assist with the investigation and prevention of crime and the protection of national security.
 - (e) TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY

The personal information we collect is not transferred to and stored in countries outside of the UK and the European Union.

(f) HOW LONG DO WE KEEP PERSONAL INFORMATION FOR?

The duration for which we retain your personal information will differ depending on the type of information and the reason why we collected it from you. However, in some cases personal information may be retained on a long-term basis: for example, personal information that we need to retain for legal purposes will normally be retained in accordance with usual commercial practice and regulatory requirements. Generally, where there is no legal requirement we retain all physical and electronic records for a period 3 years after your last contact with us or the end of your membership. Exceptions to this rule are:

Information that may be relevant to personal injury or discrimination claims may be retained
until the limitation period for those types of claims has expired. For personal injury or
discrimination claims this can be an extended period as the limitation period might not start
to run until a long time after the event.

It is important to ensure that the personal information we hold about you is accurate and upto-date, and you should let us know if anything changes, for example if you change your phone number or email address. You can contact us by using the details set out in the **"Contacting us"** section below.

(g) YOUR RIGHTS IN RELATION TO PERSONAL INFORMATION

You have the following rights in relation to your personal information:

- the right to be informed about how your personal information is being used;
- the right to access the personal information we hold about you;
- the right to request the correction of inaccurate personal information we hold about you;
- the right to request the erasure of your personal information in certain limited circumstances;
- the right to restrict processing of your personal information where certain requirements are met:
- the right to object to the processing of your personal information;
- the right to request that we transfer elements of your data either to you or another service provider;
- the right to object to certain automated decision-making processes using your personal information.

You should note that some of these rights, for example the right to require us to transfer your data to another service provider or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which apply to them and they may not apply to personal information recorded and stored by us. For example, we do not use automated decision making in relation to your personal data. However, some have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.

Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at https://ico.org.uk/for-the-public/.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "Contacting us" section below.

If you are unhappy with the way we are using your personal information you can also complain to the UK Information Commissioner's Office or your local data protection regulator. We are here to help and encourage you to contact us to resolve your complaint first.

(h) CHANGES TO THIS NOTICE

We may update this privacy notice from time to time. When we change this notice in a material way, we will update the version date at the bottom of this page. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal information.

(i) CONTACTING US

