

Privacy Policy

Purpose

This policy describes how HAHA meets its legal obligations to comply with the Data Protection Principles as set out in General Data Protection Regulations (GDPR).

Roles and Responsibilities

The Assistant Secretary is the Data Controller responsible for ensuring compliance with this policy. The Treasurer and Assistant Treasurer are responsible for the processing of data. Access to data is limited to those with a legitimate need.

What Data is Held by HAHA and Why

HAHA collects personal data necessary to meet its obligations under Article 6 (1) (a) and (c) of the Heads of Agreement with Hungerford Town Council for managing their allotments; ie plot number, name and contact details of plot holder (and would-be plot holder), date applied for/allocated/terminated and details of any non-compliance with the terms of Allotment Rental Agreements. The GDPR lawful basis for holding this data is "Delivery of Contract".

HAHA also uses this data to communicate with its members and other plot holders as part of the daily running of the allotments sites and the Association. The GDPR lawful basis for holding this data is "Legitimate Interests".

Data Retention, Storage, Security and Sharing with 3rd Parties

Hungerford Town Council require that data relating to Allotment Rental Agreements are retained for a period of 6 years after cessation of tenancy. Thereafter all data will be deleted.

The data are mainly held in unencrypted documents on the computers of committee members, who are expected to take effective security precautions.

HAHA will share your data with Hungerford Town Council to the extent required under the terms of the Heads of Agreement, but will not disclose your data to any other third party without your prior consent.

Email usage

The Assistant Secretary is responsible for mass emails across the membership, using a dedicated, secure email account. Mass emails are sent out blind copied (bcc).

HAHA website gives names and contact details of responsible committee members.

Data Protection Principles

1. Personal data shall be processed fairly and lawfully
2. Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes.
3. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
4. Personal data shall be accurate and, where necessary, kept up to date.
5. Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
6. Personal data shall be processed in accordance with the rights of data subjects under this Act.
7. Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
8. Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.