

Harlow Hill Allotment Association

Data Protection Policy

This policy is designed to bring the Association into line with the General Data Protection Regulation which came into force on 25th May 2018.

Data held by the Association

The full name, address, telephone number(s) and email address of each plot holder, associate member and any person on the waiting list are held by the Association. A record of rent payments and associate membership payments is also held. This information is provided by the member themselves when they apply to join the Association. (As a minimum, plot holders must provide their name, address and, where possible, an email address. The address is required because all plot holders must reside within a 2 mile radius of the allotment site. Email addresses are required because the majority of correspondence is done by email.)

Plot holders' data is held in a record book kept by the Lettings' Manager; in the tenancy agreements, which are kept by the Secretary and in electronic form kept by the Secretary, Treasurer and Allotment Shop Manager. Each committee member holds the data of the small group of plot holders whose plots they oversee.

The data of Associate Members is held by the Secretary, Treasurer and Allotment Shop Manager.

The data of people on the Waiting List is held by the Lettings' Manager and the Secretary.

Harlow Hill Allotment Association is a member of the National Allotment Society. When we renew our membership each year a list of names and addresses of plot holders are sent to NAS as this is a requirement of membership.

The Secretary has an overview of the data that is held by each committee member and is responsible for making sure that records are kept up-to-date.

Everyone who holds data is aware of the need to keep this data secure.

Consent

Consent to hold the above data will be sought when members join the Association and we will seek to renew consent every year when rents or associate membership fees are paid.

Reasons for holding this data

The data is held so that the Trustees and Committee of the Association can communicate with its members and so that invoices for plot rents and associate membership fees can be issued.

The data is not shared with any other party or organisation – other than the NAS as mentioned above. The data is only available to Committee members as outlined above. Measures will be taken (e.g. use of BCC on emails) to ensure that the data is not shared across the Association.

Retention of data

Data will be retained for the period of membership of the Association (i.e. as a plot holder or associate member).

On relinquishing their allotment plot or resigning from membership of the Association, all records of personal data will be deleted.

A review of the data held on members will take place at the January meeting of the Committee each year to ensure that records are accurate and appropriate information has been deleted.

Information for plot holders, associate members and persons on the waiting list

All plot holders, associate members and persons on the waiting list will be informed about what data is held on them, why it is needed and who holds their data.

Under the GDPR they can request access to the data held on them. (Under the current regulations, the Association will have a month to comply.) They also have the right to rectification, to erasure, to restrict processing, to data portability*, to object and the right not to be subject to automated decision-making including profiling. This can all be done by contacting the Secretary of the Association.

All plot holders, associate members and persons on the waiting list will be asked to consent to their data being held and confirm that they have been informed of their rights under the GDPR.

*Data portability is the ability to move data among different application programs, computing environments or cloud services.

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Policy on Photos and Videos

Photographs, videos and other media (e.g. audio) in which individuals can be identified can be seen as **personal data** in the eyes of the law, and must be taken, stored and used in line with data protection principles.

Photographs, videos and other media:

- will only be used for the purpose for which they were taken (e.g. to publicise the activities of the Association), and no other purpose.
- will not be held longer than necessary.
- will be destroyed if the people in them ask for them to be destroyed.
- will be held, and disposed of, securely so that they don't end up in the hands of a third party.

As a general rule, the names of the people who are photographed **will not** be included in any publicity.

Consent

1) Children and vulnerable adults

- Before photographing or filming children or vulnerable adults, their parent / guardian must be informed and their permission obtained by asking them to complete and sign the **Photo/Video consent form for children and vulnerable adults**, which is available from the Site Secretary.
- They will be told what the photographs or films will be used for. (This is particularly important if the images are to be used on the website or in social media.)
- If the permission of the parent/guardian is not obtained, photographs/videos must not be taken.

2) Adults

- Adults and young people will be informed before being photographed or filmed. This may be by:
 - Displaying signs at the event
 - Advertising in the publicity for the event (e.g. by including a statement such as "Photographs may be taken at this event and used in line with the terms of the Association's Data Protection Policy on photographs. Anyone not wishing to be included in the photographs of this event should notify the Secretary/organiser")
 - If practical, making an announcement.
- They will be given the chance to opt out before photos are taken.