

SOUTH HANNINGFIELD PARISH ALLOTMENTS

Charity No: 252568

DATA PROTECTION & PRIVACY NOTICE

What is the purpose of this policy?

The trustees of South Hanningfield Parish Allotments are committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you during and after your working relationship with us, in accordance with the UK the General Data Protection Regulation (the "GDPR") and other legislation relating to personal data and rights such as the Human Rights Act.

We are providing you with this privacy notice because:

You are an existing plot holder at South Hanningfield Parish Allotments, and we are required to inform you of your right relating to the personal information we hold.

Or

You are making an application for a plot and if successful will become a tenant at South Hanningfield Parish Allotments.

Who are we?

This Privacy Notice is provided to you by the trustees of South Hanningfield Parish Allotments who are the "data controller" for your data. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

The policy applies to all individuals who engage in services with South Hanningfield Parish Allotments. This policy does not form any contract to provide services. We may update this policy at any time but if we do so we will advise you as soon as reasonably practical.

Data Protection Principles

We will comply with data protection law. This says that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept and destroyed securely.

How is your personal information collected?

- We collect personal information about you from:
- Your application when applying for an allotment plot
- Completed and signed tenancy agreements
- If you subscribe or apply for any other services that require personal information

Your personal data – what is it?

"Personal data/information" is any information about a living individual which allows them to be identified from that data.

We may collect, store, and use the following categories of personal information about you:

- Names, titles, and aliases
- Contact details such as telephone numbers, addresses, and email addresses
- Where they are relevant to the services provided by the charity
- Your rental charges for your plot and plot number(s)
- Photographs

Other data controllers the charity works with:

Sometimes we may need to share your information, but we will only do so where we have a valid legal basis. We will only share the minimum information for each circumstance so that they can carry out their responsibilities. We may share your personal information with one or more of the following:

- Allotment Working Party
- Data controllers, such as local authorities
- Employees and Contractors

If the trustees of South Hanningfield Parish Allotments and the other data controllers listed above are processing your data jointly for the same purposes, then the trustees and the other data controllers may be "joint data controllers" which mean we are all collectively responsible to you for your data. Where each of the parties listed above are processing your data for their own independent purposes then each of us will be independently responsible to you and if you have any questions, wish to exercise any of your rights (see below) or wish to raise a complaint, you should do so directly to the relevant data controller.

A description of what personal data South Hanningfield Parish allotments processes and for what purposes is set out in this Privacy Notice.

We use your personal data for some or all of the following purposes:

- To contact you by post, email, telephone or using social media (e.g., WhatsApp)
- Applications when you are applying for an allotment plot.
- To advise you of plot availability if you are on our waiting list.
- Completed and signed tenancy agreements.
- When requesting payment of rent.
- To notify you of any meetings, communicate any information relating to the allotment's plots or their employees/role holders or projects.
- To enable us to meet all legal and statutory obligations and powers including any delegated functions.
- To maintain our own accounts and records.
- To seek your views, opinions, or comments.
- To process relevant financial transactions including grants and payments for goods and services.

What is the legal basis for processing your personal data?

As trustees of South Hanningfield Parish Allotments we have certain obligations. Most of your personal data is processed for compliance with legal obligations. Sometimes it is necessary to process personal data of tenants, employees or contractors that are using or providing services to the allotments. We will always consider your interests and rights. This Privacy Notice sets out your rights and our obligations to you.

We may process personal data if it is necessary for the performance of a contract with you, or to take steps to enter into a contract. An example of this would be processing your data in connection to the acceptance of an allotment garden tenancy.

Sometimes the use of your personal data requires your consent. We will first obtain your consent to that use.

Sharing your personal data

This section provides information about the third parties with whom South Hanningfield Parish Allotments may share your personal data. These third parties have an obligation to put in place appropriate security measures and will be responsible to you directly for the manner in which they process and protect your personal data. It is likely that we will need to share your data with some or all of the following (but only where necessary):

- The data controllers listed above under the heading "Other data controllers the charity works with."
- Our agents, suppliers, and contractors. For example, we may ask a commercial provider to maintain our database software.
- On occasion, other local authorities or not for profit bodies with which we are conducting joint ventures e.g. in relation to maintenance or facilities.

Data security

- Data is only accessible to those who need to use it to undertake our organisation's activities.
- We have in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered, or disclosed.
- Members' information is held securely in an electronically. Appropriate tools such as firewalls are in place and antivirus software is kept up to date.
- If we use any third parties, we ensure that such suppliers are, as appropriate, fully certified, and compliant with applicable privacy shield frameworks.
- Information held on paper (hard copies) is kept safely and to a minimum with access limited to those who need to use it.
- We have in place procedures to deal with any suspected data security breach and will notify you and the Information Commissioner's Office of a suspected breach where we are legally required to do so.

How long do we keep your personal data?

We will hold this information for as long as it is needed, or if we are required to do so by law. For example, it is currently best practice for a Charity to keep financial records for a minimum period of 6 years to support any Charity Commission, HMRC audits or provide tax information. We may have legal obligations to retain some other data such as annual reports in connection with our statutory obligations as a Charity. The trustees are permitted to retain data in order to defend or pursue insurance claims. In some cases, the law imposes a time limit for such claims (for example 3 years for personal injury claims or 6 years for contract claims). We will retain some personal data for this purpose as long as we believe it is necessary to be able to defend or pursue a claim. In general, we will endeavour to keep data only for as long as we need it. This means that we will delete it when it is no longer needed.

Your rights and your personal data

You have the following rights with respect to your personal data:

When exercising any of the rights listed below, in order to process your request, we may need to verify your identity for your security. In such cases we will need you to respond with proof of your identity before you can exercise these rights.

1) ***The right to access personal data we hold on you***

- a. At any point you can contact us to request the personal data we hold on you as well as why we have that personal data, who has access to the personal data and where we obtained the personal data. Once we have received your request we will respond within one month.
- b. There are no fees or charges for the first request but additional requests for the same personal data or requests which are manifestly unfounded or excessive may be subject to an administrative fee.

2) ***The right to correct and update the personal data we hold on you***

If the data we hold on you is out of date, incomplete or incorrect, you can inform us and your data will be updated.

3) ***The right to have your personal data erased***

- a. If you feel that we should no longer be using your personal data or that we are unlawfully using your personal data, you can request that we erase the personal data we hold.
- b. When we receive your request we will confirm whether the personal data has been deleted or the reason why it cannot be deleted (for example because we need it for to comply with a legal obligation).

4) ***The right to object to processing of your personal data or to restrict it to certain purposes only***

- a. You have the right to request that we stop processing your personal data or ask us to restrict processing.
- b. Upon receiving the request we will contact you and let you know if we are able to comply or if we have a legal obligation to continue to process your data.

5) ***The right to data portability***

You have the right to request that we transfer some of your data to another controller. We will comply with your request, where it is feasible to do so, within one month of receiving your request.

6) ***The right to withdraw your consent to the processing at any time for any processing of data to which consent was obtained***

You can withdraw your consent easily by telephone, email, or by post (see Contact Details below).

7) ***The right to lodge a complaint with the Information Commissioner's Office.***

You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

Transfer of Data Abroad

Any personal data transferred to countries or territories outside the European Economic Area ("EEA") will only be placed on systems complying with measures giving equivalent protection of personal rights either through international agreements or contracts approved by the European Union.

Further processing

If we wish to use your personal data for a new purpose, not covered by this Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing, setting out the relevant purposes, and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

Changes to this notice

We keep this Privacy Notice under regular review, and we will place any updates on this web page <https://southhanningfield-pc.gov.uk/organisation/ramsden-heath-allotments/>

Contact Details

Please contact us if you have any questions about this Privacy Notice or the personal data we hold about you or to exercise all relevant rights, queries, or complaints at:

The Data Controller
South Hanningfield Parish Allotments
Ramsden Heath Village Hall
Dowsetts Lane
Ramsden Heath
Billericay CM11 1HX
Email: contact@shallots.org.uk

Date effective from:	11.9.2025
Reviewed & Agreed at the Allotment Trustee meeting:	12.2.26
Next Review:	February 2027