



Parracombe Community Trust Ltd Data Protection Policy

(Reviewed and approved by PCT board – March 25th, 2021)

Parracombe Community Trust Ltd (Financial Conduct Authority Registration No. 7804) holds data about our members and other individuals for a variety of business purposes in pursuance of our objects.

This policy sets out how we seek to protect personal data and ensure that our members and officers understand the rules governing our use of personal data and the need to comply with the UK General Data Protection Regulation (UK GDPR).

Our membership secretary has overall responsibility for the day-to-day implementation of this policy. Any enquiries should be sent to the membership secretary at

membership@parracombe.org.uk

Use of personal data for Business purposes

Members

In addition to data retained for the purposes of membership administration (such as when you joined), we will collect and use the following personal data:

- Name
- Address
- Email address
- Telephone number

We will collect this personal data by the following means:

- Membership application forms.

We will use this personal data for the following purposes:

- Governing PCT, for example inviting you to Annual General Meetings.
- Informing you of opportunities to engage with our work, for example feeding into the design for a housing development.
- Investigating complaints.
- Improving our service to members.

We will not share this data with any other organisation without your explicit consent.

We will share aggregate information on our membership without any identifying individual data, based on this data, with interested parties.

We will retain this data so long as you are a member of PCT.

Supporters

We collect the following personal data for other individuals who may support or be interested in our work, for our newsletter:

- Email address

We will collect this personal data by the following means:

- Website form.
- Sign-up sheets at meetings and on street stalls.

We will use this personal data for the following purposes:

Email updates on PCT and our work.

We will not share this data with any other organisation.

We will retain this data so long as you subscribe to our newsletter.

Our procedures

Fair and lawful processing

We will process personal data fairly and lawfully in accordance with individuals' rights.

Accuracy

We will ensure that any personal data we process is accurate, adequate, relevant and not excessive, given the purpose for which it was obtained, and that it is not held for longer than is necessary for the business purposes set out above. We will not process personal data obtained for one purpose for any unconnected purpose unless the individual concerned has agreed to this or would otherwise reasonably expect this.

Individuals may ask that we correct inaccurate personal data relating to them. If you believe that information is inaccurate you should record the fact that the accuracy of the information is disputed and inform the membership secretary at the email address above.

The PCT board's responsibilities

All board members must take reasonable care to:

- Keep themselves updated on the Trust's UK GDPR responsibilities, risks and issues.
- Review all UK GDPR procedures and policy on a regular basis.
- Ensure UK GDPR statements are attached to all forms used to collect personal data, and to all marketing materials.
- Ensure any data protection queries from members, supporters and other stakeholders are dealt with promptly via the membership secretary
- Ensure all systems, services, software and equipment meet acceptable security standards.

- Encourage the Trust's committee members to keep themselves updated on UK GDPR issues.
- Check and approve the methods by which third parties handle the Trust's data together with any contracts or agreements regarding data processing.
- Ensure personal data is processed only for the purposes set out in this policy.
- Ensure electronic data is stored in secure systems, and paper records in a secure place.
- Avoid storing personal data on mobile devices such as laptops, phones and memory sticks, and where this is unavoidable to use strong password protection.
- Ensure any concerns about, or breaches of, the Trust's UK GDPR compliance are reported to the board immediately and remedial steps taken as necessary.

Subject access requests

A data subject may, subject to certain exceptions, request access to information held about them. Please contact the membership secretary if you would like to correct or request information that we hold about you. There are also restrictions on the information to which you are entitled under applicable law.

Data portability

Upon request, a data subject should have the right to receive a copy of their data in a structured format. These requests should be processed within one month, provided there is no undue burden and it does not compromise the privacy of other individuals. A data subject may also request that their data is transferred directly to another system. This must be done for free. Please contact the membership secretary with any such requests.

Right to be forgotten

A data subject may request that any information held on them is deleted or removed, and any third parties who process or use that data must also comply with the request. An erasure request can only be refused if an exemption applies. Please contact the membership secretary with any such requests.

International data transfers

At the time this policy was adopted by PCT (March 25th, 2021) one of the Trust's data processors, Mailchimp, stored data in the United States. An explanation of how their processes meet the requirements of UK GDPR can be found at <https://mailchimp.com/help/mailchimp-european-data-transfers/>