

MAYFIELD COMMUNITY BENEFIT SOCIETY LIMITED (“the Society”)

DATA PRIVACY POLICY

1. Overview

1.1 The Society is a community benefit society, registered number 9346. Its Object is to operate a post office in Mayfield for the benefit of the residents of Mayfield and Five Ashes and such ancillary activities as may promote the post office and other services for the community.

1.2 The Society does not collect any personal data relating to customers of the post office. All such data is recorded in encrypted form in the systems of The Post Office Limited to which the Society has no access.

1.3 The Society collects certain information about its members and supporters in order to operate effectively and efficiently.

1.4 To comply with the law, that information must be collected and used fairly, stored safely and not disclosed to any other person unlawfully. The following policy sets out how this will be achieved.

1.5 Since data technology and regulatory requirements change regularly, the Society reserves the right to amend this policy at any time.

2. Definitions

2.1 Personal data is information about identifiable, living individuals held in electronic or manual filing systems.

2.2 The Data Controller is Secretary of the Society and the Management Committee is ultimately responsible for the policy's implementation.

2.3 The Data Protection Officer is a nominated member of the Management Committee responsible for reviewing and enforcing the Data Protection Policy.

3. The Policy

3.1 In keeping information about its members and supporters, the Society will follow the six Data Protection Principles set out in the General Data Protection Regulation (GDPR), which are summarised below:

- Process data fairly and lawfully and transparently
- Collect and process data only for a specified, explicit and legitimate purpose
- Collect, process and store data only to the extent which is adequate, relevant and not excessive.
- Ensure data is accurate and up to date
- Not keep the data for longer than is necessary.
- Technical and organizational measures against unauthorized or unlawful processing, and against accidental loss, destruction, or damage

3.2 The Society's staff and Management Committee and any volunteers who process or use any personal information in the course of their duties will ensure that these principles and the following procedures are followed at all times. Guidance notes to aid adherence to the six principles above are included in Appendix 1.

3.3 When the Society has cause to obtain personal data (such as names, addresses, phone numbers, email addresses) from members and supporters, this data will be obtained, stored and processed solely to assist the Society in the effective and efficient running of its operations.

3.4 When personal data is requested from a new member or supporter, they will be given an explanation of how their personal data will be used.

3.5 A member's or a supporter's personal data will not be passed on to anyone outside the Society without explicit consent from them unless there is a legal duty of disclosure under other legislation, in which case the Management Committee will be consulted.

3.6 Only members of the Society's Management Committee and professional advisors will normally have access to members' or supporters' personal data. Only members of the Management Committee and professional advisors will have access to employees' personal data. All members of the Management Committee and professional advisors will be made aware of this Data Protection Policy and their obligation not to disclose personal data to anyone who is not authorised to have it.

3.9 The bank details obtained from members or supporters who wish to make regular donations from their personal bank accounts will be used solely for that purpose, stored in physically secured paper-based systems and in password protected electronic files. These data will be accessible to only the Society's nominated signatories to its bank account.

3.10 Members and supporters will be supplied with a copy of any of their personal data held by the Society if a request is made.

4. Accuracy and Longevity

4.1 The Society will take reasonable steps to keep personal data up to date and accurate and make corrections in a timely fashion. Personal data will be stored for as long as the member or supporter is a member of the Society or a supporter of it. Where a member or supporter ceases to be a member or supporter of the Society and it is not deemed appropriate to keep their records, their records will be destroyed.

4.2 If a request is received from an individual to destroy their records, the Society will remove their details from its records and request that any person holding paper or electronic details of that individual destroys them. This will be carried out by the Data Protection Officer. It is the responsibility of all the Society's staff and members of its Management Committee to inform the Data Protection Officer if such a request is received.

5. Storage

5.1 Personal data are kept in physically secured paper-based systems and in password protected electronic files.

6. Personal Data Relating to Staff and the Management Committee

6.1 The Society obtains personal data (names, addresses, phone numbers, email addresses), application forms, references and in some cases other documents from staff and members of the Management Committee. This data is stored and processed for the following purposes:

- to maintain the records that the Society is obliged to keep;
- to assess the suitability of an applicant for a specified role; and
- to operate the Society in an efficient and effective manner.

6.2 The contact details of the Society's staff and members of its Management Committee to other staff and members of its Management Committee. Any other information supplied on application will be kept in physically secured paper-based systems and in password protected electronic files.

6.3 Contact details of staff and members of the Management Committee will not be passed on to anyone outside the Society without their written consent.

6.4 Staff and members of the Management committee will be supplied with a copy of any of their personal data held by the Society on request.

6.5 The Society will take reasonable steps to keep personal data up to date and accurate and make corrections in a timely fashion. Personal data will be stored for as long as the staff and members of the Management Committee are involved with the Society, after which the record of that personal data will be destroyed.

7. Review of this policy

7.1 This Data Protection Policy will be reviewed at least once every three years by the Data Protection Officer to ensure it remains progressive and reflective of the UK legislation.

7.2 Any recommended changes to the policy, appended policies, procedures and forms and will be submitted to the Management Committee for approval.

APPROVED BY THE MANAFGEMENT COMMITTEE ON 21 September 2024

DATE FOR NEXT REVIEW: 21 September 2027

SECRETARY: Andrew Ratcliffe

APPENDIX 1

This appendix outlines the practical ways we are adhering to the six principles of GDPR

1. Process data fairly and lawfully and transparently

1.1 We will notify all members and supporters of the Society know what data we hold about them and why it is being held.

1.2 The privacy statement used for the above is in Appendix 2

2. Collect data only for a specified, explicit and legitimate purpose.

The purposes for collecting personal data are: to inform members and supporters clients about our activities in order to enable them to take advantage of them and to inform members and supporters of how the money they have subscribed or donated to the Society is being used.

3. Purpose limitation

We will only collect data for the reasons given above and will not use those details for activities that fall outside those of the Society.

4. Collect and store data only to the extent which is adequate, relevant and not excessive.

The information we collect are names, addresses, telephone numbers, email addresses and, in certain cases, bank details.

5. Ensure data is accurate and up to date

We will review the data held annually. We will delete data from our electronic records or destroy any physical records of data held for anyone who ceases to be a member or supporter and who, for whatever reason, informs us that they do not wish to be informed of, or participate in our activities.

6. Not keep the data for longer than is necessary

We will adhere to paragraph 5 above and if the Society organises any events out of the normal course of its operations, no personal data of attendees will be retained unless the relevant individuals have given permission to do so. We will destroy any redundant data in the manner described above.

7. Technical and organizational measures against unauthorized or unlawful processing, and against accidental loss, destruction, or damage

We will keep any physical records of data in a physically-secured manner. Electronic records will be password protected.

If our electronic records are compromised in any way, the Data Protection Officer will be informed and all individuals whose data has been, or may have been, compromised will be informed.

APPENDIX 2 -PRIVACY STATEMENT WORDING

In accordance with the General Data Protection Regulation (GDPR), Mayfield Community Benefit Society Limited (“the Society”) is required to seek permission to store any personal data held about you and to allow us to contact you in the future.

What data we hold

Personal data that the Society holds are names, addresses, telephone numbers, email and, in some cases, bank details.

Why we hold personal data

We hold this information in order for the Society to run effectively and efficiently.

How it is stored

The data stored physically is kept securely. Electronic records are password protected. Access to both physical and electronic records is restricted to those who need to use those records in order that the Society is able to run effectively and efficiently.

What we will NOT do with your data

Your data will not be passed onto any third party without your permission. Your data will not be used for any purpose other than for the efficient and effective running of the Society.

Privacy Policy

The Data Protection Policy can be accessed from the Society’s website or may be obtained in hard copy on request from the Society’s Registered Office.

You can request to see the personal data we hold about you at any time.

We will regularly review the data we hold and update it accordingly and also remove your data from our records if requested.