

# Privacy (GDPR) Policy

In this policy we use the term 'personal data' to mean any information you give us from which you can be identified. This might include your name, your home address, your personal email contact details, or your telephone number. Personal data does not include information where your identity has been removed (i.e. anonymous data).

We do not collect or use any special categories of personal data (for example, information about your health, race or religion).

Tunbridge Wells Commons Conservators collect very little in the way of personal data and this would most likely come from information you provide when interacting with us. However, please read the following policy to understand how what information we do gather will be treated.

When we refer to "we" or "us" in this policy we are referring to Tunbridge Wells Commons Conservators. For the purposes of the Data Protection Act 1998, the General Data Protection Regulation (GDPR) and any applicable replacement legislation, we are the data controller.

## Where do we gather information about you?

There are several ways in which we can collect information:

- When you make initial contact with us to deal and assist you with the issue, concern or complaint you have raised
- When you contact us via our Facebook group.
- If you enter a competition that we are running or book to attend an event we are holding.
- When you request to become a volunteer in one of our work parties.
- If you are one of our contractors and submit invoices, insurance documents and risk assessments.

## What personal identifiable information do we potentially hold?

- Your name, email address, contact phone number, Address, date of birth

## How do we use the data we have?

Tunbridge Wells Commons Conservators only use your information to send you information that you have requested, for example:

- To send you details of volunteer work parties.
- To add you to the list of those reserving a place on an event and to email you confirmation and pertinent information about that event.
- To deal and assist you with the issue, concern or complaint you have raised
- To notify you on the outcome of a competition.

Your information will not be used for any other purpose without your permission and will not be kept for longer than necessary. If you are concerned about providing your personal information online, we can arrange alternative means for you to supply information.

### Who has access to your data?

Access to your data is restricted to the Clerk and Warden.

We only ever use your personal data if we are satisfied that it is lawful and fair to do so. We will never sell your personal data or share it with third parties who might use it for their own commercial purposes.

Any sharing of personal data is always done on a case by case basis using the minimum personal data necessary.

### How do we store that data?

We have appropriate security measures in place to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We have in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Your data is stored on Microsoft 365 and Fasthosts, both systems are name and password protected.

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the information, the potential risk of harm from

unauthorised use or disclosure of your personal information, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. We review the personal data (and the categories of personal data) we hold on a regular basis to ensure the data we are holding is still required and is accurate. If we discover that certain data we are holding is no longer necessary or accurate, we will take steps to correct or delete the data.

### Accessing, updating and deleting any information we hold.

Under certain circumstances, by law you have the right to:

- Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Ask us to correct personal data that we hold about you which is incorrect, incomplete or inaccurate. If there are any discrepancies in the information we provide, please let us know and we will correct them.
- Ask us to erase your personal data from our files and systems where there is no good reason for us continuing to hold it.
- Object to us using your personal data to further our legitimate interests (or those of a third party).
- Ask us to restrict or suspend the use of your personal data, for example, if you want us to establish its accuracy or our reasons for using it.
- Ask us to transfer your personal data to another person or organisation.

You also have rights in relation to automated decision making that has a legal effect or otherwise significantly affects you. However, we do not currently undertake any decision making based solely on automated processing, including profiling, that would produce any significant legal effects concerning you.

If you want to exercise any of these rights, please contact us at [info@twcommons.org](mailto:info@twcommons.org)

### Queries and Complaints

If you have any questions about this privacy notice or how we handle your personal information, please contact us at [info@twcommons.org](mailto:info@twcommons.org)

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

Date of review: September 2020

Date of next review: September 2023