



# Privacy Policy Notice

## The Harbertonford Community Limited (THCL)

THCL ("the Society") is committed to protecting and respecting your privacy.

The rules on processing of personal data are set out in the General Data Protection Regulation (GDPR). We adhere to the six principles of Data Protection set out in the GDPR and embodied in the Data Protection Act 2018.

These principles state that personal data must be:

- fairly and lawfully processed
- used for specified, explicit and legitimate purposes
- adequate, relevant and not excessive
- accurate and kept up to date
- not kept for longer than is necessary
- used with appropriate security and protected against unlawful or unauthorised processing, access, loss, destruction or damage

This Privacy Notice sets out how we handle personal data that we may collect from you through your use of our website and any other means. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

### 1. Some Definitions

Data Controller – is an entity or individual that determines the purpose and means of processing personal data. (THCL in this instance the Data Controller)

Data Processor - is responsible for processing personal data on behalf of a controller

Data Subject – is the owner of personal information.

Personal Data - is any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (as explained in Article 6 of GDPR); for example name, passport number, home address or private email address; online identifiers include IP addresses and cookies.

Special Category Personal Data – is sensitive personal data referred to by GDPR as 'special categories of personal data' (as explained in Article 9 of GDPR); the special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual; other examples include racial and

ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.

Aggregated Data – is data derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity; for example, we may aggregate your website usage data to calculate the percentage of users accessing a specific website feature, or use your postcode to map where people interested in us live

Processing - means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Third party - means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data

## **2. Who is the data controller ?**

THCL is the *data controller*. This means we decide how your personal data is processed and for what purposes. Our contact details are: Lyndhurst, Woodcourt Road, Harbertonford, Devon TQ9 7TY. For all data matters contact our Data Protection Officer at [admin@harbertonford.com](mailto:admin@harbertonford.com) .

## **3. What personal data does THCL hold ?**

We collect personal data from the Members (shareholders) of the Society, non-Members (individuals who have expressed an interest in the activities of the Society) and volunteers (Members or non-Members who help the Society to achieve its aims).

The personal data we hold consists of names and contact details (including postal address, phone numbers and email address). For Members, the personal data we hold also includes details of shareholdings. If we change the extent of the personal data we hold, we will inform you.

We do not collect any Special Categories of Personal Data (see definitions).

## **4. Data minimisation**

THCL shall ensure that the personal data held are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## **5. Accuracy**

THCL shall take reasonable steps to ensure personal data is accurate.

Where necessary, for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

## **6. The purposes of processing your personal data**

We hold this personal data so that we can communicate information about the aims and activities of the Society to interested parties and to enable the Society to conduct its business. Additionally, for Members, we hold information about shareholding so we can properly administer our register of Members, inform Members about Society meetings and other Society business.

## **7. What is our legal basis for processing your personal data?**

The legal basis for collecting personal information is the *legitimate interest* of running the organisation.

For personal data of data subjects with a private email address, our lawful basis for processing general personal data is consent from the data subject.

For personal data of data subjects with an email address owned by a corporate entity, our legal basis is a *legitimate interest*.

Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent will be clearly available.

## **8. International Transfer of Data**

We may as a result of using online services transfer and store data outside of the European Economic Area (EEA). All data processing services we may use will be ones that are subject to security and privacy regulation and controls equivalent to GDPR.

## **9. Automated Decision Making**

We do not use any form of automated decision making.

## **10. Cookies and links**

Our website uses Cookies. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that our website may not function properly. For more information about the cookies we use, please see <https://harbertonford.com/policies/index.php#cookie-policy>

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## **11. Changes to our privacy policy**

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by email.

## **12. Data Security**

Your personal data will be treated as strictly confidential and will be protected. We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We limit access to your personal data to those personnel within THCL who need to know in order to carry out their duties.

Where we use third parties, for example for deliveries, we require them to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **13. Your rights and your personal data**

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;
- The right to withdraw your consent to the processing at any time, where consent was the lawful basis for processing the data;
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable i.e. where the

processing is based on consent or is necessary for the performance of a contract with the data subject and where the data controller processes the data by automated means);

- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable i.e. where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics).

#### **14. Queries, requests and complaints**

To exercise all relevant rights, raise queries and make requests or complaints please contact our Data Protection Officer at [admin@harbertonford.com](mailto:admin@harbertonford.com) .

If we do not resolve your request to your satisfaction, you have the right to lodge a complaint with the Information Commissioner's Office on 03031231113 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, England.

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