

OAKINGTON & WESTWICK COMMUNITY ASSOCIATION

DATA POLICY

To comply with current regulations, on the matter of storage and use of personal data, the Community Association (CA) and its sub-committees, as defined in the CA constitution, will be:

- **Clear:** information on what data is held and how it is being used can always be requested
- **Fair:** the data will not be used for purposes that would be deemed unfair; data will not be shared without consent
- **Safe:** the data will be kept secure and any data breaches reported to those affected

Typically, the CA will only be handling names and contact details such as email or phone numbers.

CLEAR

Individuals' Rights

Under data regulations, individuals can request:

- To know what data we have stored on them
- To request information on how the data has been used
- To have all of their data removed

FAIR

Use of Data under a Lawful Basis

The use of the data will be under the basis of consent where gaining consent is possible. There may be cases where the lawful basis of use of data is by legitimate interest, where consent is not possible - e.g., due to time constraints. The meanings of the terms consent and legitimate interests, in this case, are:

- **Consent:** you have given us clear consent for us to use your personal data for a specific purpose.
- **Legitimate interests:** the use of your personal data is necessary for our legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the your personal data which overrides those legitimate interests.

There are some uses of held personal data which will be deemed lawful use:

- Communication from the CA on issues for which the data was originally collected (e.g. volunteering for an event)
- Communication on CA related issues, which may be a different purpose to the one for which the data was originally collected
- Sharing with an external organisation specifically relevant to the reason the data was originally collected (e.g. sending volunteer contact details to the organising committee of an event external to the CA)

At any time an individual can exercise any of their rights as explained in the section titled "Individuals' Rights".

Data Retention

The CA will delete any stale data after each AGM (approx. 1 year) with the appointment of a new committee, or otherwise delete all data on dissolution of the Community Association. Stale data will be determined by asking the current contacts for an opt-in.

SAFE

Security

Personal data will be held in cloud storage or hard copy and normally only shared with the CA committee. If exceptions in data sharing occur, notification of this will be made to gain consent, and data will only be shared with an opt-in from the individual. There may be certain circumstances where data will be shared for legitimate purposes, unless it is deemed that your data would be risk for doing so. We will always seek to protect your data with assurances from third-parties that your data remains safe.

Data Breach

All data breach events will be reported to all individuals from whom we have personal data.

Roger Duthie

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