

COVERDALE COMMUNITY PUB LTD (CCP)

Data Protection Policy

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1) Definitions

Personal data is information about a person which is identifiable as being about them. It can be stored electronically or on paper, and includes images and audio recordings as well as written information.

Data protection is about how we, as an organisation, ensure we protect the rights and privacy of individuals, and comply with the law, when collecting, storing, using, amending, sharing, destroying or deleting personal data.

2) Responsibility

Overall and final responsibility for data protection lies with the Directors, who are responsible for overseeing activities and ensuring this policy is upheld.

3) Overall policy statement

CCP needs to keep personal data about its committee, members, tenants and from time to time other volunteers or supporters. This is necessary in order to carry out activities.

We will collect, store, use, amend, share, destroy or delete personal data only in ways which protect people's privacy and comply with the UK General Data Protection Regulation (GDPR) and other relevant legislation.

We will only collect, store and use the minimum amount of data that we need for clear purposes, and will not collect, store or use data we do not need.

We will only collect, store and use data for:

- purposes for which the individual has given explicit consent, or
- purposes that are in the CCP's legitimate interests, or
- contracts with the individual whose data it is, or
- to comply with legal obligations, or
- to protect someone's life, or
- to perform public tasks.

We will provide individuals with details of the data we have about them when requested by the relevant individual.

We will delete data if requested by the relevant individual, unless we need to keep it for legal reasons.

We will endeavour to keep personal data up-to-date and accurate.

We will store personal data securely.

We will not share personal data with third parties without the explicit consent of the relevant individual, unless legally required to do so.

We will endeavour not to have data breaches. In the event of a data breach, we will endeavour to rectify the breach by getting any lost or shared data back. We will evaluate our processes and understand how to avoid it happening again. Serious data breaches which may risk someone's personal rights or freedoms will be reported to the Information Commissioner's Office within 72 hours, and to the individual concerned.

To uphold this policy, we will maintain a set of data protection procedures for our committee and volunteers to follow.

4) Review

This policy will be reviewed every two years

Date.....9/11/2023

Signature (Chair).....M. E. Watson

Signature (Secretary).....M. E. Watson

APPENDIX A: Data protection procedures

1) Introduction

The CCP has a data protection policy which is reviewed regularly. In order to help us uphold the policy, we have created the following procedures which outline ways in which we collect, store, use, amend, share, destroy and delete personal data.

These procedures cover the main, regular ways we collect and use personal data. We may from time to time collect and use data in ways not covered here. In these cases we will ensure our Data Protection Policy is upheld.

2) General procedures

Data will be stored securely. When it is stored online in a third party website (e.g. Dropbox) we will ensure the third party comply with the UK GDPR. Access to such a website will be password protected. When it is stored on paper it will be filed carefully and securely.

When we no longer need data, or when someone has asked for their data to be deleted, it will be deleted securely. We will ensure that data is permanently deleted from computers, and that paper data is destroyed.

We will keep records of consent given for us to collect, use and store data. These records will be stored securely.

3) Membership list

We will maintain a membership list. This will include the names and contact details of people who are members or designated delegates of members of the CCP.

When people sign up to become CCP members they will receive information about how their details will be used, how they will be stored, and their rights and the process for terminating membership. Current information is as follows:

"By requesting that I become a member of and investing in the Coverdale Community Pub Ltd I agree to my name, address, phone numbers, email address and the number of shares that I wish to purchase being held on a computer database. I understand that this information will be used solely for the purpose of maintaining a register of members and potential members as required by the rules of the Community Benefit Society, for posting of notices regarding the activities of the Coverdale Community Pub Ltd and will not be passed to any third party. The rules are available on www.coverdalecommunitypub.co.uk"

4) Contacting committee members

The committee need to be in contact with one another in order to run the organisation effectively and ensure its legal obligations are met.

Committee contact details will be shared among the committee.

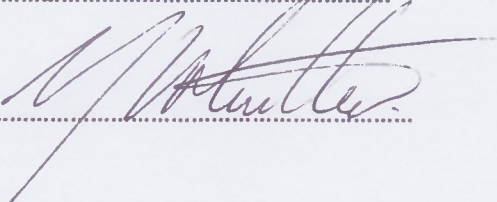
Committee members will not share each other's contact details with anyone outside of the committee, or use them for anything other than CCP business, without explicit consent.

5) Review

These procedures will be reviewed every two years

Date.....9/11/2023

Signature (Chair).....M E Watson

Signature (Secretary).....

APPENDIX B: Confidentiality Agreement for Committee Members

Name of Organisation: COVERDALE COMMUNITY PUB LTD - CCP

This agreement applies to all committee members in regards to the confidentiality of information relating to Coverdale Community Pub Ltd (CCP)

WHEREAS:

A) The Committee Member may be privy to Confidential Information in relation to their duties.

B) The Committee Member agrees not to deal with the Confidential Information other than in accordance with the terms of this agreement.

THE COMMITTEE MEMBER AGREES AS FOLLOWS:

1.0 DEFINITIONS

1.1 For the purpose of the Agreement:

“Confidential Information” and “Documents” includes but is not limited to:

- i) Minutes from Board Meetings
- ii) Telephone calls/messages
- iii) Emails
- iv) Personal correspondence
- v) Sensitive financial information including:
- vi) Accounts & reports of the CCP
- vii) Accounts & reports of the tenants of the Foresters Arms (past & present)

2.0 CONFIDENTIAL OBLIGATIONS

2.1 The Committee Member unless expressly otherwise agreed with is:

- i) Not to reveal any of the confidential Information to any person outside of the Committee or relevant staff.
- ii) To keep all of the Confidential Information secret and confidential;
- iii) Not to make copies or duplicates of the confidential information except to the extent that it is reasonably necessary.

The obligation to maintain confidentiality and not to use the Confidential Information shall remain in effect for an indefinite period.

3.0 GENERAL

3.2 If there is a breach of this Confidentiality Agreement, disciplinary action will be taken which could result in instant removal from the Management Committee.

I will abide by this Confidentiality Agreement:

Name: _____

Signature: _____ Date: _____

APPENDIX C: GDPR Reference Letter to Shareholders

19th May 2018

Dear Shareholder

As you will probably be aware by now the General Data Protection Regulations come into effect on the 25th May 2018.

To satisfy the requirements of these regulations, I am contacting you to let you know how Coverdale Community Pub Ltd. will use the personal details you provided when you became a shareholder.

Your details will be held on a database which will be used for communicating with you with regard to managing your shareholding in Coverdale Community Pub Ltd.

Due care will be taken to ensure that your details and the database are kept securely.

We will use your details to inform you of our decision to hold a shareholders meeting.

We will use your details to send you a dividend payment should the decision be made to pay a dividend.

We may from time to time send you a newsletter if we feel that there is anything that may be of interest to you regarding your shareholding in Coverdale Community Pub Ltd.

Your details will not be shared with any third party and will not be used for marketing purposes.

Unless you contact me to the contrary, Coverdale Community Pub Ltd. will assume that you accept how we will hold and use your details.

Please could you inform me if you should change address, e-mail address, telephone numbers or name.

Kind Regards

John Watson

Membership Secretary