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Rotherham Allotment Alliance Ltd

Data Policy

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Rotherham Allotment Alliance Ltd Data Policy

Purpose

The purpose of this policy is to ensure that all staff, shareholders, allotment tenants, and volunteers understand the Rotherham Allotment Alliance's requirements regarding the disclosure of personal data and confidential information. The Rotherham Allotment Alliance (RAA) is committed to full compliance with the Data Protection Act 2018 and GDPR.



Principles

The RAA adheres to the following principles:

- **Lawfulness, Fairness, and Transparency:** Personal data is processed lawfully, fairly, and transparently.
- **Purpose Limitation:** Personal data is collected for specified, explicit, and legitimate purposes.
- **Data Minimisation:** Only necessary personal data is collected.
- **Accuracy:** Personal data is accurate and up-to-date.
- **Storage Limitation:** Personal data is stored only for as long as necessary.
- **Integrity and Confidentiality:** Personal data is processed securely and confidentially.
- **Accountability:** The RAA is accountable for its data processing activities.

Responsibilities

- **RAA Board:** Responsible for overall compliance with GDPR.
- **Staff and Volunteers:** Responsible for handling personal data in accordance with this policy.

Training and Awareness

- Staff and volunteers receive GDPR training.
- Awareness campaigns are conducted to promote compliance.

Data Collection and Processing

- The RAA collects personal data for allotment management, membership, and communication purposes.
- The RAA collects personal data for:
 - Employees
 - Volunteers
 - Shareholders
 - Tenants, Co-Workers and Applicants
- Data subjects are informed about the purpose of data collection.
- Consent is obtained where necessary.
- Data is processed securely and confidentially.



The type of personal information we collect

- We currently collect and process the following information:
 - Personal identifiers, contacts and characteristics (for example, name and contact details)
 - Online identifiers, including IP addresses and cookie identifiers via our website

How we get the personal information and why we have it

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- Allotment management, membership, and communication purposes.

We also receive personal information indirectly, from the following sources in the following scenarios:

- Your allotment plot is managed by an allotment society. The society will share the necessary information for us to contact you as an RAA shareholder.
- Your allotment plot is managed by an allotment society that dissolves. The dissolved society will share the necessary information to transfer your tenancy to RAA direct management.

We use the information that you have given us to manage your applications and tenancies. We will use your information to process payment of rent and other associated costs. We will use your data in an anonymised form for statistical analysis and compliance with required regulations.

We may share this information with Rotherham Metropolitan Borough Council (RMBC) in an anonymised form. We may also share your information with RMBC in the event that your allotment tenancy is transferred back to their direct management.

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

- Your consent. You are able to remove your consent at any time. You can do this by contacting admin@rotherhamallotments.org.uk or PO Box 819, Rotherham, S60 9NR
- We have a contractual obligation.
- We have a legitimate interest.



How we store your personal information

Your information is securely stored.

We keep application data electronically for 6 months after an application is withdrawn or closed. We will then anonymise your information using our data management system.

We keep personal information related to your tenancy electronically for seven years after the tenancy ends. We will then anonymise your information using our data management system.

We keep personal information relating to financial transactions electronically for seven years after the financial year end they relate to. We will then delete the data.

Paper documents containing personal information are digitised and stored electronically. Original paper copies are shredded once stored electronically.

Your data protection rights

Under data protection law, you have rights including:

- Your right of access - You have the right to ask us for copies of your personal information.
- Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.
- Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- Your right to object to processing - You have the right to object to the processing of your personal information in certain circumstances.
- Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at admin@rotherhamallotments.org.uk or PO Box 819, Rotherham, S60 9NR if you wish to make a request.

Data Breach Response

- The RAA will report and investigate data breaches.



- Data subjects will be informed if a breach poses a risk to their rights and freedoms.

Review and Updates

- This policy is reviewed annually.

Updates are made as necessary to reflect changes in legislation or organisational practices.



Subject Access Request (SAR) Process

Understanding SARs

- **SAR (Subject Access Request):**
 - A SAR is a request made by or on behalf of an individual for the information they are entitled to ask for under **Article 15 of the UK GDPR**.
 - It allows individuals to access their own personal data held by an organisation.
 - A SAR can be made verbally or in writing, including via social media.
 - The requester does not need to use specific phrases; it just needs to be clear they are asking for their own data.
 - The RAA will record details of SARs received.

Further information

Find out about your data protection and information rights including how to make a SAR, how to make an FOI request, domestic CCTV and data protection, protecting yourself against nuisance marketing and more.

<https://ico.org.uk/>



Making a SAR to Rotherham Allotment Alliance

- In most cases it is not necessary to make a SAR to obtain the information that you require. You can contact the RAA to request access or submit changes to your data via the usual contact methods.
- **Identify Your Request:**
 - Clearly state that you are making a Subject Access Request.
 - You can do this verbally or in writing.
- **Contact the RAA:**
 - Send your request to the RAA; it does not have to be directed to a specific person.
 - Include your full name and contact details.
 - Describe the information you are seeking.
- **Confirm Identity:**
 - The RAA may need to contact you in writing to confirm your identity.
 - Be prepared to provide additional information if requested to support your request.
- **Receive the Information:**
 - The RAA will usually provide the requested information within **one month** of receiving the request.
 - This may include personal data related to your allotment tenancy, membership, or communication.



How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at admin@rotherhamallotments.org.uk or PO Box 819, Rotherham, S60 9NR.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>