

## **Hogacre Common's privacy and data protection policy**

### **Hogacre Common privacy notice and data protection policy, May 2018**

1. Hogacre Common is committed to ensuring anyone can be clear about:

- What personal data it holds
- Why it holds personal data
- How it uses personal data
- How it keeps personal data safe
- How long it keeps personal data
- How it responds to subject access requests
- With whom and in what circumstances it shares personal data.

2. Hogacre Common will comply with British data protection law, which for the time being includes complying with the European Union's General Data Protection Regulation.

3. Hogacre Common will publish this policy on its website and will make it available on paper on request to anyone who does not have access to the website.

4. Hogacre Common falls under the "not for profit" exemption which only allows an organisation to use data in very limited ways and so is not registered with the Information Commissioner's Office.

5. Hogacre Common collects and uses personal data for two purposes which affect what we hold, how we use it and how long we keep it. These are explained below.

#### **Supporters**

6. Hogacre Common keeps supporters email addresses for the sole purpose of keeping them informed of activities, events and other news relating to Hogacre Common and other projects taking place on site. This information will be kept for as long, but only for as long, as they remain a supporter. Supporters can unsubscribe from the mail list at any time via this [link](#).

#### **Directors**

7. When a person becomes a Director of Hogacre Common, they must understand that Hogacre Common will have by law to give certain personal data about them to the Registrar of Companies. Anyone becoming a Director must accept that Hogacre Common will have to collect and pass on that personal data.

8. Hogacre Common will not use for any other purpose personal data which it collects for governance purposes without first obtaining specific consent from each individual concerned.

#### **Data security**

9. Hogacre Common keeps its email circulation lists in the Mailchimp system. This means personal data is processed outside the European Economic Area. This is currently possible under a temporary Privacy Shield agreement between the EU and the USA.

10. Hogacre Common will keep under review whether continued use of Mailchimp is lawful.

11. Any person given access to personal data held by Hogacre Common by virtue of being a Director, an employee, a volunteer or a project convenor will be made aware of this policy and their obligations.

### **Individuals' rights**

12. Anyone has the right to:

- Ask what personal data Hogacre Common holds about them
- Ask how Hogacre Common uses any personal data it holds about them
- Ask Hogacre Common to correct personal data it holds about them
- Withdraw their consent to Hogacre Common holding any data it holds about them which it processes only by virtue of their consent and ask for that data to be deleted.

13. If you want to make a Subject Access Request, find out more about the processing of your personal data or make a complaint about the way Hogacre Common processes your personal data, please either:

- email [info@Hogacre Common.org](mailto:info@Hogacre Common.org), or
- write to Hogacre Common at its registered address, which is 22 Oatlands Road, OXFORD, OX2 0ET.

14. There is generally no fee for dealing with a Subject Access Request and the information will generally be provided within one month of receiving the request.

15. If a request is manifestly unfounded or excessive, particularly if it is repetitive, Hogacre Common may:

- Charge a fee based on the administrative cost of providing the information, or
- Refuse to respond.

16. Hogacre Common may also charge a fee, calculated on the same basis, to comply with requests for further copies of the same information.

17. If requests are complex and numerous, Hogacre Common may inform the person within one month of making the request why it will only be able to respond within three months.

18. If you are not satisfied with the way Hogacre Common handles a request or a complaint, you have the right to appeal to the Information Commissioner's Office (ICO). There is no charge for making an appeal. The contact details of the ICO are as follows:

The Information Commissioner's Office,

Wycliffe House,

Water Lane,

WILMSLOW,

Cheshire, SK9 5AF

0303 123 1113 (local rate),

Email: [casework@ico.gov.uk](mailto:casework@ico.gov.uk)

### **Breaches of data protection**

19. If Hogacre Common is aware of a possible breach, it will be the responsibility of the Directors to investigate and, if necessary, to report it to the ICO.

20. The Directors shall designate one of their number to be responsible for data protection. In the absence of that Director, the Chair of the Directors shall ensure another Director deals with the alleged breach within the timescales required by the ICO.

This policy was approved by Hogacre Common's Directors on 20 May 2018.