



## PRIVACY NOTICE

### Definitions

<b>Charity</b>	Witton Lodge Community Association (WLCA) is a company limited by guarantee (number 2903760) and a registered charity (number 1039005)
<b>GDPR</b>	Means the General Data Protection Regulation
<b>Register of Information Systems</b>	Means a register of all systems or contexts in which personal data is processed by Witton Lodge Community Association and its subsidiaries.

#### 1. Data Protection Principles

Witton Lodge Community Association is committed to processing data in accordance with its responsibilities under the GDPR.

#### Article 5 of the GDPR requires that personal data shall be: -

- a) Processed lawfully, fairly and in a transparent manner in relation to individuals.
- b) Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes.
- c) Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- d) Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.
- e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures."

#### 2. General Provision

- a) This policy applies to all personal data processed by Witton Lodge Community Association
- b) The Responsible Person shall take responsibility for Witton Lodge Community Association's ongoing compliance with this policy.
- c) This policy shall be reviewed at least annually.
- d) Witton Lodge Community Association is registered with the Information Commissioner's Office as an organisation that processes personal data.

### 3. Lawful, Fair & Transparent Processing

- a) To ensure its processing of data is lawful, fair and transparent, Witton Lodge Community Association shall maintain a 'Register of Systems.'
- b) The Register of Systems shall be reviewed at least annually.
- c) Individual's have the right to access their personal data and any such requests made to Witton Lodge Community Association shall be dealt with in a timely manner.

### 4. Lawful Purposes

- a) All data processed by Witton Lodge Community Association must be done on one of the following lawful basis: consent, contract, legal obligation, vital interests, public task or legitimate interests (see [www.ico.org.uk](http://www.ico.org.uk) for more information)
- b) Witton Lodge Community Association shall note the appropriate lawful basis in the Register of Systems.
- c) Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- d) Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in Witton Lodge Community Association's systems.

### 5. Data Sharing

- a) Witton Lodge Community Association will not share the personal data you provide us with for marketing purposes with any other third party. You have the right to see the personal data we hold on you at any time and can request this via the contact details at the bottom of this notice. You also have the right to ask us to correct any errors in the personal data we hold on you.
- b) WLCA will only share your data within our organisation with internal colleagues who run services in Housing, Employment & Skills, Health & Wellbeing, and Community Life including Volunteering if you agree, and we think this will help you in some way going forward to get the best out of all the services we offer.
- c) Witton Lodge Community Association shall ensure that personal data is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed

#### **You can only share data without an individual's knowledge in cases where: -**

- The prevention or detection of crime
- The apprehension or prosecution of offenders
- The assessment or collection of tax or duty

### 6. Accuracy

- a) Witton Lodge Community Association shall take reasonable steps to ensure personal data is accurate.
- b) Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that data is kept up to date.

## **7. Archiving/Removal**

- a) To ensure that personal data is kept for no longer than necessary, Witton Lodge Community Association shall put in place an archiving policy for each area in which personal data is processed and review this process annually.
- b) The archiving policy shall consider what data should/must be retained, for how long, and why.

## **8. Security**

- a) Witton Lodge Community Association shall ensure that personal data is stored securely using modern software that is kept up-to-date.
- b) Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c) When personal data is deleted this should be done safely such that the data is irrecoverable
- d) Appropriate back-up and disaster recovery solutions shall be in place.

## **9. Right to withdraw consent**

- a) You have the right to withdraw your consent at any time and it must be as easy to withdraw as it was to give. To withdraw email: [Kay.Blundell@wittonlodge.org.uk](mailto:Kay.Blundell@wittonlodge.org.uk) or call 0121 382 1930.

## **10. Breach**

- a) In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, Witton Lodge Community Association shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO ([www.ico.org.uk](http://www.ico.org.uk))