

Data Protection Policy & Website Privacy Policy for www.odfaa.com

Introduction

The data that delegates provide the Federation are kept in documents that are held and processed both as hard copy and electronically. This means that the Federation is subject to the **General Data Protection Regulation 2016 (GDPR)** which comes into force in the UK on 25th May 2018. It replaces the Data Protection Act 1998 and will harmonise data protection law throughout Europe. Under GDPR we have responsibilities of care to uphold. This document outlines our policies.

What sort of data we hold and how are they held?

What data do we keep?

We are only allowed to keep data that are necessary for our Federation activities. We keep some or all the following:

1. Name
 2. Allotment Association (and on which site if you have more than one)
 3. Email address
 4. Postal address.
 5. Landline phone number and/or mobile phone number
- The Federation uses electronic spreadsheets to manage personal data (including membership and finances). These spreadsheets are held securely on cloud servers or on individual Committee members' computers and are emailed between Committee members on a need-to-know basis.
 - When you pay money to us (e.g. your ODFAA membership), we may keep a record of your payment and what it was for, together with name (or payment reference).
 - ODFAA Committee meetings are held every few months (with and without Oxford City Council representation). Committee minutes, which may include personal data, are emailed to Committee members. However, minutes are redacted to remove personal data before posting on the website.
 - The minutes of the Federation AGM and Allotment Liaison Meetings, including names of attendees, are posted on our website.
 - Our bank account is with The Coop Bank. Committee members who are signatories on the bank account are able to see Coop statement of members' electronic payments.

Confidential or sensitive information

- Members may occasionally disclose confidential information to the Committee, for example if illness or family problems are making it difficult to serve as a delegate or officer.
- This information is only shared between Committee members, and only on a 'need to know' basis.

Accuracy

- You are the source of your own personal information, initially from when you became a delegate to the Federation, and then changes that you notify us about.
- We will endeavour to maintain accurate records, but we rely on members keeping us up-to-date.
- All information is checked for accuracy at each and every ALM and AGM meeting.

Email usage

- The Federation uses email to handle most administration and communication tasks.
- The Federation Treasurer responsible for bulk emails has an email account used for this purpose (johnplardner@hotmail.com) which has a strong password.
- This account contains members' email data.
- In cases of bulk emailing (e.g. to send out notice and paperwork for the AGM), we make sure to use the Blind Carbon Copy (Bcc:) function to ensure other members' email addresses are not visible.

What are the data used for?

The data are only used for legitimate Federation uses; these include:

- Communication between committee members and delegates as part of the running of the Federation
- Notification of Federation meetings and the minutes of those meetings
- Provision of news to Federation members.

What are the data NOT used for?

- We will not disclose your data to other members or to third parties or use it on behalf of third parties.
- For example, members may sometimes be lobbied to advertise a service or product that might be useful to other members of the Federation.
- We will not use your addresses to do this (no "spam" allowed).

Our legal basis on which we hold your personal data

- GDPR data protection law has six possible bases on which to hold personal data, including Obtaining Consent, and as Legitimate Interests.
- Like other membership organisations we hold your personal data on the basis of 'Legitimate Interests'.
- This is defined as meaning in ways one would "reasonably expect ... and which have a minimal privacy impact, or where there is a compelling justification for the processing" such as being able to communicate with our members.
- For example, one of our key functions as a Federation is to negotiate annual insurance cover for our member Associations which often requires multiple contact points for each Association in order for insurance forms to be completed and returned in what is usually a very small amount of time. ODFAA cannot fulfil this responsibility without adequate Association contact details and therefore has a Legitimate Interest in holding this information.
- See: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/legitimate-interests/>.

Who can hold, process or access personal data and how long are data retained?

Who has access to the data?

- Only those who need access to the data have access and they do not share it with anyone else.
- The following Committee members have access to the full membership data: Federation Minutes Secretary (and Data Controller), Treasurer, Chair.
- The names of all Committee members are in the public domain. It is occasionally necessary for their contact details to be shared with outside bodies, for example, for the purposes of insurance.

How do we protect the data?

- Data are held as documents on password-encrypted computers and data are stored on a GDPR-compliant Cloud server
- Mobile (“smart”) phones are sometime used for email purposes. Phones are vulnerable to loss and theft so if they are used for Federation business they must at least use a 4-character PIN.
- Spreadsheets containing multiple records will not be kept on phones.

What happens when a delegate leaves the Federation?

- We do not keep data that is not needed for operation of the Federation. The data for delegates who leave are usually held for at most 6 months, after which time they will be deleted from our records.
- We keep the data for a short period in the event that we need to communicate with a delegate who has recently left, and only for the purpose of resolving any outstanding matters.

The purposes for which we hold personal data

The key purpose for holding any personal data is for the administration of the Federation. In practice, this means:

- Payment for ODFAA membership.
- Arranging insurance cover for member Associations.
- Helping administer Oxford City Council allotment grants.
- Communication about the Federation (e.g. AGM, ALM).
- Issues with Associations, and facilitation or arbitration services provided to these Associations.
- Urgent contact for site/Association problems.
- Management of the Federation as a whole, e.g. meeting minutes, analysis of Association rents, Council lease agreements.

Data Policy Implementation

- A nominated member of the committee is responsible for ensuring that this policy is adhered to.
- The **GDPR Data Controller** is the Federation Minutes Secretary who will undertake this role.
- Other Committee members act as **GDPR Data Processors** – collecting data e.g. from new delegates.

Your rights

- Data protection law gives you certain rights. Full details are available on the Information Commissioner's website.
- For a small organisation like ours with relatively simple records, the relevant rights are for you to see your record and to correct any errors in it. Members can at any time ask the Data Controller for a copy of their recorded data. To request this, send an email to secretary@westoxfordallotments.org
- When you come to any ALM or to the AGM you can check the information we hold on you is correct.
- You also have a right to complain to the supervising authority, ie. to The Information Commissioner's Office (www.ico.org.uk).

Website Privacy Policy

We are committed to safeguarding the privacy of our website visitors; this policy sets out how we will treat your personal information.

What information do we collect?

We may collect, store and use the following kinds of personal data:

- information about your computer and about your visits to and use of this website (including your IP address, location, browser type, referral source, length of visit and number of page views)
- information that you provide to us for the purpose of subscribing to our website services, email notifications and/or newsletters
- any other information that you choose to send to us

Cookies

- A cookie consists of information sent by a web server to a web browser, and stored by the browser. The information is then sent back to the server each time the browser requests a page from the server. This enables the web server to identify and track the web browser.
- We may use “session” cookies on the website. We will use session cookies to keep track of you whilst you navigate the website. Cookies are deleted from your computer when you close your browser.
- These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information anonymously, including number of visitors to the site, where visitors have come to the site from and pages visited.
- Most browsers allow you to reject all cookies, whilst some browsers allow you to reject just third party cookies. For example, in Internet Explorer you can refuse all cookies by clicking “Tools”, “Internet Options”, “Privacy”, and selecting “Block all cookies” using the sliding selector. Blocking all cookies will, however, have a negative impact upon the usability of many websites.

Using your personal data

Personal data submitted on this website will be used for the purposes specified in this privacy policy or in relevant parts of the website. We may use your personal information to:

- administer the website;
- improve your browsing experience by personalising the website;
- enable your use of the services available on the website;

Third party websites

The website may contain links to other websites. We are not responsible for the privacy policies or practices of third party websites.

Updating information

Please let us know if the personal information which we hold about you needs to be corrected or updated.

Contact

If you have any questions about this privacy policy or our treatment of your personal data, please write to us by email to secretary@westoxfordallotments.org