Oxford and District Federation of Allotment Associations

Founded 1919

orking together for Oxford allotments

GDPR Privacy Notice

On May 25th the General Data Protection Requirement (GDPR) comes into force – replacing the previous Data Protection Act. Requirements include that members of all organisations need to **be made aware of** the information held about them, and the **uses** to which that data is put.

ODFAA has recently devised and circulated example GDPR Privacy Notices and Data Protection Policies for Associations to adapt and use relating to their own members.

ODFAA **does not** hold data on member Associations' own members but **does** hold data on those Associations' delegates to ODFAA and their officers. Therefore we need our own GDPR Privacy Notice (this document) and our own Data Protection Policy.

ODFAA holds some (or all) of the following data about nominated contacts from each of its member Associations:

- 1. Name
- 2. Allotment Association, and on which site
- 3. Postal address
- 4. Landline phone number and/or mobile phone number
- 5. Email address
 - This data is physically and electronically securely stored by the ODFAA Minutes Secretary (acting as GDPR Data Controller) and available only to serving ODFAA Committee members.
 - The Federation itself uses this information to contact you to inform you of its activities over the year including administration of grants and meetings.
 - Your data will not be passed on to any other third party without your prior permission.
 - The Federation does <u>not</u> have dealings with third parties where basic personal information (name. address etc.) is required to be passed to them (such as seed suppliers, or other commercial organisations).
 - Personal data for Committee members and Trustees do need to be shared with some third parties

 e.g. Oxford City Council (as landlords) and the company providing insurance cover to member

 Associations where contact details are required as a condition of insurance cover.

How can you ask for data to be removed, limited or corrected?

- Each member is entitled to see their own entry.
- If you are willing to remain as one of the contacts for your Association we do need to have at least one method of contacting you. You could for example simply maintain an up-to-date email address.
- If you do not wish to remain as one of the contacts for your Association then your personal data can be deleted from our records if you contact the ODFAA Data Controller (see below)

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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/).

In any matters relating to how the Federation collects, stores or uses your data you have the right to complain to the Information Commissioner's Office.

Further information on the GDPR and how your personal data is used and stored can be found on the Data pages on the ODFAA website.

The ODFAA Data Controller is currently:

Dr Nick Jackson
Osney, St Thomas & New Botley Allotments Association
68 Edwin Court, Binsey Lane
Oxford, OX2 0QJ
07740 460173

secretary@westoxfordallotments.org