

Date Adopted:

Date for Review:

Oct / Nov 2028

Date Reviewed:

1. Data Protection Policy and Privacy Notice Framework

- 1.1. Tir Pontypridd Cymdeithas Cyfyngedig Ltd (henceforth Tir Pontypridd), its directors, employees & volunteers have a legal duty to act responsibly towards our members, customers, staff, suppliers and the public with regards the effect our organisations operations have on **Data Protection and Privacy**.
- 1.2. We will endeavour to meet our collective responsibilities by following our **Data Protection Policy and Privacy Notice**.
- 1.3. This policy has been developed in line with voluntary sector guidance on the **General Data Protection Regulation (GDPR)** – a European law, that applies in the UK, to 'personal data' that is collected, stored and used, and is overseen by **The Information Commissioner's Office (ICO)**.
- 1.4. 'Personal data' is defined as information relating to an identifiable living person who can be directly or indirectly identified from that information, including 'sensitive personal data', e.g. race or ethnic origin, religion, health, genetics and biometrics.
- 1.5. The **6 principles of data protection** set out under the GDPR state that data shall be:
 - 1.5.1. Processed lawfully, fairly and in a transparent manner in relation to individuals;
 - 1.5.2. Collected for specified, explicit and legitimate purposes, and not processed in any manner that is incompatible with those purposes;
 - 1.5.3. Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
 - 1.5.4. Accurate and, where necessary, kept up to date;
 - 1.5.5. 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;
 - 1.5.6. Processed in a manner that ensures appropriate security of the personal data, using appropriate technical or organisational measures.
 - 1.5.7. The GDPR also sets out an overarching principle of accountability. This requires **data controllers** to be responsible for, and be able to demonstrate compliance with, the 6 principles set out above.
- 1.6. **Data Control & Data Processing:**
 - 1.6.1. The 'Data Controller' is the organisation, or person that collects and uses personal data and determines the purposes & means of processing that data.
 - 1.6.2. A 'Data Processor' is the organisation or person responsible for processing personal data on behalf of a data controller. This might include organisations providing services such as membership payments and donations.
- 1.7. **Privacy Notice:** GDPR legislation requires a detailed privacy notices to be provided to individuals when personal data is collected, including information such as:
 - 1.7.1. The purpose(s) that the personal data will be processed for
 - 1.7.2. The lawful basis that the organisation is relying upon to process that individual's data (see below)

Tir Pontypridd Cymdeithas Cyfyngedig Ltd

C/O Pete's Shop, 24 Taff Street, Pontypridd, Rhondda Cynon Taf, CF37 4UA

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- 1.7.3. How long the data will be retained for
- 1.7.4. who the data will or might be shared with, and
- 1.7.5. The individual's right to withdraw consent if they wish to.
- 1.8. **Data Breaches:** GDPR introduces a duty on all organisations to report a personal data breach to the ICO *if they believe it is likely to risk the rights and freedoms of the individual(s) whose data has been breached.*

2. Privacy & GDPR in practice

- 2.1. Tir Pontypridd collects, stores, and uses 'personal data' from the following people:
 - 2.1.1. Tir Pontypridd Directors & Advisors to the Board
 - 2.1.2. Tir Pontypridd Members and Member Applicants
 - 2.1.3. Tir Pontypridd Volunteers, Contracted Sole Traders & Staff
 - 2.1.4. Donors, and those who make pledges to donate
 - 2.1.5. Staff & Volunteers of Partner Organisations, Funders & Contractors
 - 2.1.6. Elected Members and Officials of Public Bodies
 - 2.1.7. Individuals who make enquiries or engage with us via social media.
- 2.2. Tir Pontypridd Directors will **appoint** a **Lead Data Controller** as the person responsible for collecting, storing and utilising personal data.
 - 2.2.1. Unless otherwise stated this will be the Co. Secretary or acting Co. Secretary.
 - 2.2.2. Information on the criteria, and the specifics of the role, can be found here: [Information Commissioner's Office GDPR Guide](#)
- 2.3. Tir Pontypridd will provide a **Privacy Notice** to individual persons at the point at which the information is collected. The statement will set out what individual persons need to know regarding their data protection, including:
 - 2.3.1. The purpose(s) personal data will be processed for
 - 2.3.2. The lawful basis Tir Pontypridd is relying upon to process personal data
 - 2.3.3. How long the data will be retained for
 - 2.3.4. Who the data will or might be shared with
 - 2.3.5. The individual's right to withdraw consent if they wish to.
- 2.4. Tir Pontypridd's **Lawful Basis for Processing Data** is **Legitimate Interests**.
 - 2.4.1. The processing of your personal data is necessary for Tir Pontypridd's legitimate interests (unless you have told us of a good reason to protect your individual personal data, which overrides those legitimate interests).
- 2.5. **Data Breaches:** If Tir Pontypridd Directors, Staff or Volunteers believe a data breach has occurred, *that is likely to risk the rights and freedoms of the individual(s) whose data has been breached*, then Tir Pontypridd Directors, Staff or Volunteers will:
 - 2.5.1. Report to the ICO within 72 hours.
 - 2.5.2. Inform those individuals of the breach without undue delay.
 - 2.5.3. Event where not reported to the ICO Tir Pontypridd will log all incidents of data breaches and assess how such incidents can be avoided in future.

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3. Implementation

- 3.1.** A copy of this policy & privacy notice will be made available to all Directors, Staff, Volunteers, Members & members of the public on joining / at induction and via our website, and Directors, Staff, Volunteers will be encouraged to implement it.
- 3.2.** It is the responsibility of the Directors of Tir Pontypridd to ensure adequate training for all Directors, Staff & Volunteers to help them implement the policy.
- 3.3.** All Directors, Staff & Volunteers are responsible for ensuring that all aspects of the policy are carried out in undertaking the organisations activities.
- 3.4.** Any persons deliberately disregarding this policy, without the knowledge/approval of the board, or found to be encouraging others to do so, will face a disciplinary.

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Tir Pontypridd Privacy Notice

Purpose: This Privacy Notice informs you how and why we may collect and use your personal data, and what to do if you have a question, or concern about its use. This Privacy Notice is designed to give you an understanding of what personal information we collect, why we need it, and what protections are in place to keep it secure.

This Privacy Notice is published on our website, and copies are available on request by contacting the Company Secretary, either by post or email. For the purpose of this notice Tir Pontypridd Cymdeithas Cyfyngedig Ltd is the "data controller".

The Organisation: Tir Pontypridd Cymdeithas Cyfyngedig Ltd (Tir Pontypridd) is registered with the Financial Conduct Authority as Community Benefit Society 9479 under the Co-operative and Community Benefit Societies Act 2014, and is also recognised by HMRC as Charitable Company number ZD47447. Our registered office is: C/O Pete's Shop, 24 Taff Street, Pontypridd, Rhondda Cynon Taf, CF37 4UA

Tir Pontypridd's charitable objects are "*for the public benefit to advance environmental protection and improvement through conservation and sustainable development, and to work towards the regeneration of land and buildings for the relief of poverty in Pontypridd and surrounding areas*". The society controls and processes personal data to meet these objects.

Tir Pontypridd Approach to Privacy

To carry out activities that help us deliver our charitable objectives then we need to collect personal information relevant to your connection and relationship with the society.

We take your privacy seriously and respect any information which you share with us, whatever your relationship with us. We recognise the importance of your privacy and are committed to ensuring that it is protected. We aim to be transparent and not to do anything you might not reasonably expect. For example, we will never sell or rent your data to third parties, nor pass it on to third parties without your prior knowledge and consent.

How we collect information from you

We collect and use information about you and your organisation depending on your circumstances and your relationship with us, including personal information you share with us.

There are a number of ways you might share your information with Tir Pontypridd, including:

- By approaching the society in the interests of applying for membership;
- If you contact us with enquiries, correspond with us or become involved with us in another way (including via social media outlets);
- By applying to volunteer, become an advisor or director, or employment at the society;
- If your details are passed to us by another organisation within the terms of their privacy policy, for example as a means of obtaining a reference;
- We may also collect information which is publicly available (such as your professional address, email address or telephone number), e.g. via your organisation's website, professional profile, or Companies House / Charity Commission / Land Registry etc.

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What type of information might Tir Pontypridd collect, store and process about you?

We will only collect information which is directly relevant to your relationship with the society, and for which you have given us consent to collect and retain.

The personal information we might collect includes:

- Your names, email addresses and other contact details of the key point of contact in relation to a particular enquiry or membership application;
- Records of your correspondence with us;
- The full contents of your membership application(s), and records relating to this;
- Financial or payment details required to process subscription's, donations grants, and gifts made, share purchases and re-payments, loans received and repayments etc;

We will never collect or retain your personal data or sensitive personal data without your informed consent.

How we use your information

We will only use your data under the lawful bases of legitimate interest (or contract).

We may use your information to:

- Administer your membership application, including requesting further information from you in relation to your application or addressing breaches in membership;
- Conduct due diligence upon an individual, project or organisation interested in working with us, or in making a gift / donation of finance / land.
- Produce internal documentation for Trustees in the furtherance of decision-making on making membership applications, or in responding to enquiries / offers;
- Produce internal documentation for Trustees for the purposes of monitoring and evaluating the performance of projects / enterprises;
- Receive / make payments
- To obtain a reference about a particular organisation or individual;
- To ask your permission to share details of your project / organisation with other relevant organisations / individuals;
- To communicate with you about relevant society news which may further our charitable objectives, including marketing fundraising activities & events;
- To process membership, volunteering, employment, tendering applications;
- We may be obliged to share your information with the FCA / Charity Commission.

We may also use your data to conduct broader reviews of the delivery of our objects, through the analysis of past applications and projects; these reviews will only ever be shared internally within the society, or with appointed consultants of the society.

How we protect and store your information

We take the protection of your data very seriously. All information you provide to us is stored securely and treated with care and respect. Appropriate technical controls are in place to store and protect data. We have security procedures in place to guard against unauthorised access, improper use, alteration, destruction or accidental loss of your information.

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Information is only accessible by appropriately trained and authorised staff for the specific purpose of their work at the society.

Who has access to your data?

Our director's, volunteers, staff and consultants may access your personal data to enact a particular activity of the society, for example as part of our membership application process, or in the organising of community workshops & events. Only our Chair, Finance Director & Company Secretary have access to membership payment details.

How long we keep your information

We keep your data in line with legislation and statutory guidelines relevant to your relationship and connection with us. All records are destroyed confidentially once their retention period has been met, and the society has made the decision that the records are no longer required.

Sharing your information

There are several reasons we may share your information including:

- Our obligations to comply with current legislation
- Our duty to comply with a court order or legal obligation.
- To enforce or apply agreements, or protect the rights, property or safety of the society.
- Where you have given your explicit and informed consent for us to share your personal story to help further our work.

We will never sell or rent your data to third parties.

Your personal data

We aim to ensure that the information we have for you is accurate and up to date. You can request to see this information and if, for example, you believe that something is incorrect, or you do not wish us to retain it, you can ask to have it corrected or deleted.

You may

- Request a copy of the personal information we hold about you by making a written 'Subject Access Request' by post or via email;
- Update or amend the personal information we hold about you if it is wrong;
- Ask us to remove your personal information from our records;
- Raise a concern or complaint about how your personal information is being used;
- Request the transfer of your information to you, or a third party.

Please send your request, concern, or complaint in writing outlining a description of the information you want to obtain **with proof of your identity to:** The Co. Secretary

- C/O Pete's Shop, 24 Taff Street, Pontypridd, Rhondda Cynon Taf, CF37 4UA
- or via email:

The Society will aim to reply to a formal request within one month of receipt but it this may take longer if key directors are not available at the time the request is made.

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