

Privacy Policy

This Privacy Policy applies to information we (Cricklade Development Foundation Limited, 'The Society') collect about individuals who interact with our organisation, regardless of how the information is collected. We recognise the need to treat personal information in an appropriate and lawful manner. The purpose of this Policy is to explain what personal information we collect and how we use it.

1. Who are we?

Cricklade Development Foundation Limited at Cricklade Town Hall, High Street, Cricklade SN6 6AE take the issue of security and data protection very seriously and strictly adhere to guidelines published in the General Data Protection Regulation (EU) 2016/679 which is applicable from the 25th May 2018, together with any domestic laws subsequently enacted.

We are notified as a Data Controller with the Office of the Information Commissioner under registration number ZB606703 and we are the data controller of any personal data that you provide to us.

Any questions relating to this notice and our privacy practices should be sent to contact@crickladefoundation.org.uk

2. Personal data that we process

The following table explains the types of data we collect and the legal basis, under current data protection legislation, on which this data is processed.

Purpose	Data (Key Elements)	Basis
Enquiring about our organisation and its work	Name, email, message	Legitimate interests - it is necessary for us to read and store your message so that we can respond in the way that you would expect
Subscribing to email updates about our work	Name, email	Consent - you have given your active consent
Signing up as a supporter	Name, address, email	Consent - supporters who have expressed an interest in becoming a member, or pledged their support in some other way
Signing up as a member	Name, address, telephone, email, bank details	Compliance with a legal obligation - the Society has a legal obligation to maintain a register of members, inform members of general meetings, and participate in elections and special resolutions. Performance of a contract – the Society has a contract with members as shareholders in the Society, and matters associated with that shareholding
Nomination of beneficiary for transfer of shares	Name, address, telephone, email, Date of Birth, bank details of nominee.	Legitimate interests – members may complete a Beneficiary Nominee form to transfer up to 100 shares to their nominated beneficiary/s in the event of their death, which will remain outside of their estate.

Website functionality	Website activity collected through cookies	Legitimate interests - it is necessary for us to store a small amount of information, usually through cookies, to deliver functionality that you would expect from the website
Acting as a director of the Society	Name, address, telephone, email, date of birth.	Compliance with a legal obligation - the Society has a legal obligation to maintain a register of directors, complete returns to the Financial Conduct Authority and file Company Tax Returns.
Becoming a Tenant (including prospective tenant applications and any guarantor)	Email address, date of birth, address (including any previous addresses), relationship to other prospective tenants, employment status, name of university or college where you are studying (if applicable); the name of friends that you are staying with (if applicable); property term, rent, deposit, utility and service responsibilities; Bank account details, including account number and sort code, and any hire purchase/loan agreements/credit cards or store cards that you have. Employment information to include address, contact details (including email, phone and fax numbers) of the employer/accountant, payroll numbers, length of employment, salary information (including any regular overtime or commission), business plan, business financial accounts and any other income received such as welfare benefits. Documentary evidence required such as the right to rent sharing code, residency papers, passports, driving licence, and references.	<p>Compliance with a legal obligation – in accordance with the Immigration Act 2014, landlords and agents must check the immigration status of their prospective occupiers at the outset of the tenancy to ensure they have a ‘right to rent’.</p> <p>Legitimate interests - to carry out due diligence on any prospective tenant and/or guarantor, including whether there are any money judgements against them, or any history of bankruptcy or insolvency.</p> <p>Performance of contract - to undertake and perform our obligations and duties to our tenants in accordance with the terms of our contracts with them. This will help us to manage the tenancies and enable us to supply tenants with the services and information which they have requested, contact them in order to send details of any changes to our suppliers which may affect them; analyse information collected to improve our services, and for or all other purposes consistent with the proper performance of our operations and business.</p>
Use of CCTV at The Old Police Station	CCTV cameras located within the Elizabeth II Walkway and curtilage of property, will record images digitally for storage automatically on SD cards, and retained for a defined period.	Legitimate interests – to maintain the security of the premises, to provide a safe and secure environment for our tenants and visitors, and to prevent and detect crime and anti-social behaviour including to assist Law Enforcement Agencies to carry out their lawful duties.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

3. How we use your data

We will only use your data in a manner that is appropriate considering the basis on which that data was collected, as set out in the table at the top of this policy. For example, we may use your personal information to:

- Respond to enquiries you send to us.
- Where you have specifically agreed to this, send you newsletters or other updates by email relating to our work which we think may be of interest to you.
- To maintain a private register of members and for posting notices regarding the activities of the Society.
- To complete and file returns required by the Financial Conduct Authority and/or the Inland Revenue.
- To ensure prospective tenants comply with the 'right to rent' legal requirements set out in the Immigration Act 2014.
- To carry out due diligence on any prospective tenant (and/or guarantor) to assess suitability to rent our premises.
- To perform our obligations and duties to tenants in accordance with their contract terms.
- To protect our business, the local community, tenants, and visitors.

4. When we share your data

The information you provide to me/us will be treated by me as confidential and will be processed only by any third party, acting on our behalf, within the UK.

We may disclose your information to other third parties who act for us for the purposes set out in this notice or for purposes approved by you.

We will only pass your data to third parties in the following circumstances:

- You have provided your explicit consent for us to pass data to a named third party; or
- We are using a third party purely for the purposes of processing data on our behalf and we have in place a data processing agreement with that third party that fulfils our legal obligations in relation to the use of third-party data processors; or
- To carry out due diligence on you as a prospective tenant/guarantor, including but not limited to the carrying out of affordability checks, due diligence checks and the obtaining of references from relevant parties, whose data you have provided; or
- If you request so, your information shall be disclosed in order to determine if there are any money judgements against you, as the prospective tenant/guarantor, or to determine if they have a history of bankruptcy or insolvency; or
- If you are unable to make payments under your tenancy, your information may be disclosed to any relevant party assisting in the recovery of this debt or the tracing of you as a tenant; or
- In the creation, renewal or termination of the tenancy, your information will be disclosed to the relevant local authority, tenancy deposit scheme administrator, service/utility provider, freeholder, factor, facilities manager or any other relevant person or organisation in connection with this; or
- Unless required to do so by law, we will not otherwise share, sell or distribute any of the information you provide to me/ us without your consent.

In addition, we will only pass data to third parties outside of the European Union where appropriate safeguards are in place as defined by Article 46 of the General Data Protection Regulation.

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control

these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

5. How long we keep your data

We take the principles of data minimisation and removal seriously and have internal policies in place to ensure that we only ever ask for the minimum amount of data for the associated purpose and delete that data promptly once it is no longer required.

Where data is collected on the basis of consent, we will regularly review consents to check that the relationship, the processing and the purposes have not changed. We have processes in place to renew consent at appropriate intervals.

6. Rights you have over your data

You have a range of rights over your data, which include the following:

- Where data processing is based on consent, you may revoke this consent at any time and we will make it as easy as possible for you to do this (for example by putting 'unsubscribe' links at the bottom of all our marketing emails).
- You have the right to ask for rectification and/or deletion of your information.
- You have the right of access to your information.
- You have the right to lodge a complaint with the Information Commissioner if you feel your rights have been infringed.

A full summary of your legal rights over your data can be found on the Information Commissioner's website here: <https://ico.org.uk>. The Information Commissioner's contact details for England are noted below:

Information Commissioner's Office
Wycliffe House, Water Lane
Wilmslow, Cheshire, SK9 5AF
Telephone: 0303 123 1113
Email: casework@ico.org.uk

If you would like to access the rights listed above, or any other legal rights you have over your data under current legislation, please get in touch with us by emailing contact@crickladefoundation.org.uk or by writing to us at: Cricklade Development Foundation Limited, Cricklade Town Hall, Cricklade, SN6 6AE

Please note that relying on some of these rights, such as the right to deleting your data, will make it impossible for us to continue to deliver some services to you. Furthermore, we may not be able to delete data if this is in conflict with our legal requirements as a Community Benefit Society and Landlord. However, where possible we will always try to allow the maximum access to your rights while continuing to deliver as many services to you as possible whilst continuing to meet our legal obligations.

7. Cookies

A cookie is a small file of letters and numbers that is downloaded on to your computer when you visit a website. Cookies are used by many websites and can do a number of things, e.g. remembering your preferences, or counting the number of people looking at a website.

Where cookies are used to collect personal data, we list these purposes in section 2 above, along with other personal data that we collect.

However, we also use some cookies that do not collect personal information but that do help us collect anonymous information about how people use our website. We use Google Analytics for this purpose.

Google Analytics generates statistical and other information about website usage by means of cookies, which are stored on users' computers. The information collected by Google Analytics about usage of our website is not personally identifiable. The data is collected anonymously, stored by Google and used by us to create reports about website usage. Please see Google's privacy policy for more information.

8. Changes to this policy

We may modify this Privacy Policy from time to time and will publish the most current version on our website. If a modification meaningfully reduces your rights, we will notify people whose personal data we hold and who are affected.