

Adopted 18<sup>th</sup> November 2025

## Tideswell and District CLT

### Data Protection policy

Tideswell and District Community Land Trust (TDCLT) holds data about its members and other individuals for a variety of business purposes in pursuance of its objects.

This policy sets out how TDCLT seeks to protect personal data and ensure its members and officers understand the rules governing use of personal data<sup>1</sup>.

The relevant law is the Data Protection Act 2018 (DPA 2018) and the UK General Data Protection Regulation (UK GDPR)

TDCLT has decided to have a Data Protection Officer (DPO) The DPO is TDCLT's Secretary, and they have overall responsibility for the day-to-day implementation of this policy. Any enquiries should be sent to them: [admin@tideswellclt.org](mailto:admin@tideswellclt.org)

### Business purposes

Members	<p>In addition to data held for the purposes of membership administration (such as when you joined and how long you have lived in the TDCLT area), TDCLT will collect and use your following personal data:</p> <ul style="list-style-type: none"><li>• Name</li><li>• Address</li><li>• Email address</li><li>• Telephone number</li></ul> <p>This personal data is collected by:</p> <ul style="list-style-type: none"><li>• Membership application forms.</li></ul> <p>This personal data will be used for:</p> <ul style="list-style-type: none"><li>• Governing TDCLT, eg inviting you to General Meetings.</li><li>• Informing you of opportunities to engage with TDCLT work, eg feeding into the design for a housing development.</li><li>• Investigating complaints.</li><li>• Improving TDCLTs service to members.</li></ul> <p>TDCLT will not share this data with any other organisation without your explicit consent. TDCLT may share aggregate information on our membership without identifying individual personal data with interested parties.</p> <p>TDCLT will keep this data as long as you are a member of TDCLT.</p>
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<sup>1</sup> This policy is also on TDCLT's website <https://www.tideswellclt.org/>

Supporters	<p>TDCLT collects personal data of other individuals who may support or be interested in our work for its newsletter:</p> <ul style="list-style-type: none"><li>• Email address</li></ul> <p>This personal data is collected by:</p> <ul style="list-style-type: none"><li>• Website form.</li><li>• Sign-up sheets at meetings and on stalls at public events.</li></ul> <p>This personal data is used to:</p> <ul style="list-style-type: none"><li>• Email updates on TDCLT and its work.</li></ul> <p>TDCLT will not share this data with any other organisation.</p> <p>TDCLT will keep this data only as long as you subscribe to the newsletter.</p>
Consultation and Surveys	<p>If TDCLT undertakes surveys or consultations for its business purposes, it may collect detailed personal data on households, including data on each individual in the household and financial circumstances. The information provided will be used by TDCLT to provide information for a Housing Needs Survey Report. No data will be shared or published which could identify any individual. More detail on the information to be collected, the purposes, how the data is used, and with whom it will be shared, would be set out on any survey or consultation.</p>

## TDCLT procedures

### *Fair and lawful processing*

TDCLT will process personal data fairly and lawfully in accordance with individuals' rights. Generally this means personal data will not be processed unless the individual has consented to this happening.

### *Accuracy*

TDCLT will ensure that any personal data processed is accurate, adequate, relevant and not excessive, given the purpose for which it was obtained, kept safely and that it is not held for longer than necessary for the business purposes set out above. We will not process personal data obtained for one purpose for any unconnected purpose unless the individual concerned has agreed to this or would otherwise reasonably expect this.

Individuals may ask that we correct inaccurate personal data relating to them. If you believe that information is inaccurate you should record the fact that the accuracy of the information is disputed and inform the Data Protection Officer.

### *The Data Protection Officer's responsibilities*

- Keeps the board updated about data protection responsibilities, risks and issues.
- Reviews all data protection procedures and policies on a regular basis.

- Ensures data protection statements are attached to all forms used to collect personal data, and to all marketing materials.
- Deals with data protection queries from members, supporters and other stakeholders.
- Ensures all systems, services, software and equipment meet acceptable security standards.
- Arranges data protection training and advice for TDCLT officers and staff (if any).
- Checks and approves with third parties (if any) that handle TDCLT's data any contracts or agreement regarding data processing.

The responsibilities of other officers, staff (if any) and volunteers (data processors)

- Only process personal data for the purposes set out in this policy.
- To store electronic data in secure systems, and paper records in a secure place.
- To generally avoid storing personal data on mobile devices such as laptops, phones and memory sticks, and where this is necessary to use password protection.
- To report any concerns or breaches to the DPO immediately, and to take remedial steps if necessary.

### *Subject access requests*

As a data subject you may, subject to certain exceptions, request access to information held about you. Contact the DPO if you would like to correct or ask for information that TDCLT hold about you.

### *Data portability*

Upon request, a data subject should have the right to receive a copy of their data in a structured format. These requests should be processed within one month, provided there is no undue burden and it does not compromise the privacy of other individuals. A data subject may also request that their data is transferred directly to another system. This must be done for free. Please contact the DPO with any request.

### *Right to be forgotten*

A data subject may request that any information held on them is deleted or removed, and any third parties who process or use that data must also comply with the request. An erasure request can only be refused if a legal exemption applies. Please contact the DPO with any such requests.

### *International data transfers*

No data will be transferred outside of the EEA without the explicit consent of the data subject.