

The Highfield Residents' Association (HRA) Data Protection Policy is designed to protect your personal data held by the HRA. Please ensure you read this Policy carefully.

The HRA will take appropriate security measures to ensure that your data is protected and secured in accordance with the relevant data protection laws, including the UK General Data Protection Regulation (GDPR).

### **1. The personal information we collect**

The personal data required by the HRA to process a membership application is as follows: the name and title of each member; at least one terrestrial address; at least one telephone number; one email address if it exists; and any bank account details necessary for any financial transactions. It will not be possible to process any applications without this personal data.

Permission to store and use this personal data is required from each member. This consent is requested on the membership application form which requires a valid confirmatory signature and the date of consent. This consent will be continuous with your renewed membership and will normally only have to be done once. Where there is more than one person living in a household, the person signing the form is responsible for signing on behalf of all other individuals living at that address.

### **2. What we use your data for**

The personal data is required solely for processing applications to join the HRA, maintaining and renewing membership and for communications with members, including newsletters and other general information communications. We do not sell members' data.

### **3. Sharing information**

3.1. Access to your personal data is restricted to HRA Committee Members only and where mentioned in Sections 3.2 and 3.3 below.

3.2. We do not share any of your data with third parties with the exception of (i) our Street Representatives (who are all members) and solely for the specific purposes of delivering communications from us. We provide only the information they need to perform this specific task and they may only use your data for that purpose. (ii) Where there is a legal requirement to provide it to a government body as part of a Licensing Objection. To be valid, an objection needs to be accompanied by the names and addresses of all the members on behalf of whom the objection is made, in order that the proximity to the establishment in question can be demonstrated. The objection is then made available to the applicant.

3.3. Apart from the above, data will only be given to or shared with other parties to comply with legal obligations to share data with law enforcement; a court of law; the security services; or where such disclosures are required to protect the safety or security of any persons.

#### **4. The publication of members' personal data**

Members' personal data will only be included on the website or in a newsletter or other general information communication, including on other digital platforms, with the permission of the member.

#### **5. The publication of Committee Members' personal data**

5.1. The following personal data of HRA Committee Members is accessible to HRA members and the general public and can be used in routine correspondence, information communications, newsletters, on the website and other HRA digital platforms: name, title, responsibilities, email address, a photo (if given) and a short biography (if given). In addition to the above, all Committee Members agree to share any additional personal data as necessary to their role within the committee.

5.2 All Committee Members agree to share with each other the personal data that appears in the internal Committee Member listing.

5.3. All Committee Members agree to inform the Data Protection Officer of any notifications relating to Section 7 below so that the necessary action can be taken.

#### **6. Websites and Digital Platforms**

6.1. The HRA has a website: [www.highfieldresidents.org.uk](http://www.highfieldresidents.org.uk). It also has a Facebook page which members can choose to opt into voluntarily. This requires specific consent. These may contain links to other websites / digital platforms which are provided for your convenience. The HRA is only responsible for the privacy practices and security of its own digital platforms and therefore we recommend you check the privacy and security policies of each and every other website and digital platform that you visit, including either directly or indirectly through our website and our other digital platforms.

6.2. When you interact with our digital platforms, we may also automatically collect your IP address; information as a result of any online enquiry forms you complete or emails you send; and any social media posts.

6.3. The HRA Facebook page hosts third party information from both members and non-members. However, none of the information provided by third parties, including pictures, descriptions and comments, is the responsibility of the HRA. Anyone posting content to this page is solely responsible for their own content. The HRA reserves the right to 'ban' users or delete posts that do not adhere to the Terms of Use included on the Facebook page.

#### **7. Your rights**

Members have certain rights under data protection legislation, including a right to request a copy of the personal information we hold on you, if you request it in writing. The UK GDPR also provides the following rights:

- **the right to have your personal information rectified if it is inaccurate or incomplete;**

- **the right to request that we delete or remove your personal information from our systems;**
- **the right to 'block' us from using your personal information or limit the way in which we can use it;**
- **the right to object to our use of your personal data including where we use it.**

One or more of the above may result in us being unable to register or maintain your membership of the HRA.

## **8. The role of the Data Protection Officer**

8.1. Notification to the HRA Data Protection Officer of a request of a member for their data to be removed, rectified or limited (see item 7 above) will place the onus on the HRA Data Protection Officer to ensure the removal or rectification of all the relevant personal data from all databases held by the HRA. However, if your membership has lapsed, we may retain your personal details on all our databases for historical purposes unless you request that we remove it (see item 7 above).

8.2. Notification to the HRA Data Protection Officer of the resignation or retirement of a HRA Committee Member will place the onus on the HRA Data Protection Officer to ensure the removal of all relevant personal data from publication on the HRA website.

8.3. The HRA Data Protection Officer is responsible for data protection; for the maintenance and security of the data; and ensuring that it is up-to-date. **All queries and requests must be addressed to them. They can be contacted on email: [highfieldracomms@gmail.com](mailto:highfieldracomms@gmail.com).**

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