



UK-GDPR Privacy Statement

1. Scope

This paper explains how the Brookfield Allotment Association (the Association) endeavours to protect tenants' and applicants' data in context of the UK General Data Protection Regulations (UK-GDPR). The Association holds and uses personal data supplied by its tenants and applicants and, in the context of UK-GDPR, is a "data controller". This privacy statement is intended to explain what data we hold, why we need it, how we use it and who has access to it.

The paper addresses:

- An outline of the requirements of UK-GDPR
- Principles of the Society's data protection
- Information held
- Who has access to the data
- Data security and retention
- Rights of access, correction, and erasure

2. Requirements of UK-GDPR

The Association collects and processes personal data to manage our allotment sites, tenancies, and applications. This information is required to undertake our role and to meet the conditions of our lease with the London Borough of Waltham Forest, the Association's constitution, and the requirements of the Association's Tenancy Agreements. Under UK-GDPR, the level of data held is categorised as "legitimate interests". The Association does not collect "special" category or sensitive data and does not use CCTV on its sites. Upon becoming aware of any breach of privacy, the Association shall inform the Information Commissioner Office (ICO) within 72 hours.

This policy statement is posted on our website. New applicants will be directed to this privacy notice, and new tenants will be reminded of the policy at the time of signing tenancy agreements.

3. Principles of the Association's Data Protection

We comply with data protection law and principles, which means that your data will be:

- used lawfully, fairly and in a transparent way
- collected only for valid purposes and not used in any way that is incompatible with those purposes
- kept only as long as is necessary

- kept securely

4. Information held

In connection with your involvement with the Association we collect, store, and use the following information about you:

- your date of application, tenancy commencement and closure
- your title and full name
- your postal address
- your email address
- your home and/or mobile telephone numbers

It is important that if any of your personal information should change, such as your contact details or address, you should inform us as soon as possible so that we can keep our records up to date.

5. Who has access to the data

The Joint Data Controllers for the Association is the Committee (with the Chairman primary responsible for complying with UK GDPR obligations). There are four Data Processors for the Association. They are: The Chairman, Secretary, Treasurer and Membership.

Data is only accessible to those who need to use it to undertake the Association's duties, specifically:

- The Association's Committee (the Committee) has access to all held data.
- Details of all tenants and associated correspondence may be submitted to London Borough of Waltham Forest if such information is requested (in accordance with the terms of the lease).

6. Data security and retention

We have in place appropriate security measures to prevent your personal information from being accidentally lost, used, or accessed in an unauthorised way. Data is held in the following locations:

- Within the Committees individuals computers protected by anti-virus applications, this is primarily for copies of correspondence, minutes, procedures, and general Association administration.
- Information held on paper is kept safely and to a minimum. This is primarily limited to the signed tenancy agreements and some correspondence.
- In order to carry out their duties, data may be held temporarily by members of the Committee on their personal or Association computers. This is necessary while processing invoices, tenancy agreements, inspection plans etc. Appropriate tools

such

as firewalls and antivirus software is kept up to date. Back-up devices are kept to a minimum and kept securely.

- The Association also hosts a webpage, but this does not carry any personal data.

Although applications are made through the webpage, no personal data is held there.

We only hold data for as long as we reasonably need it. Data is retained as follows.

- We retain your personal information while you are an applicant or tenant.
- Tenant data is held for six months after giving up your tenancy.
- An applicant's data is deleted after the applicant withdraws their application.
- Historical records and other non-essential and time expired information will be routinely deleted and securely destroyed. Paper documentation will be shredded.

7. Rights of access, correction, and erasure

You have the right to:

- Request access to your personal information. This enables you to receive a copy of the personal information we hold about you.
- Request correction of the personal information that we hold. This enables you to have any incomplete or inaccurate information corrected.
- Request erasure of your personal information. This enables you to request the deletion of personal information where there is no valid reason for us continuing to hold it.

If you want to review, verify, correct or request erasure of your personal information or have any queries relating to the Society's holding of your data, please contact: The Secretary by e-mail secretary@brookfieldallotments.co.uk.

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