



# Chorlton Community Land Trust

## Data Protection Policy

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### Introduction

Chorlton CLT holds data about our members and other individuals for a variety of business purposes in pursuance of our objects.

The business purposes and data collected for each are described in the [Data Privacy Notice](#).

This policy sets out how we seek to protect personal data and ensure that members and officers understand the rules governing our use of personal data.

At present the amount and type of data processing we carry out means we do not need a Data Protection Officer, and overall responsibility for the day-to-day implementation of this policy lies with members of the governance sub-committee, referred to below as the Data Protection group.

### Fair and lawful processing

We will process personal data fairly and lawfully in accordance with individuals' rights. This generally means that we will not process personal data unless the individual whose details we are processing has consented to this happening.

### Accuracy

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

Individuals may ask that we correct inaccurate personal data relating to them. If anyone believes that information is inaccurate they should record the fact that the accuracy of the information is disputed and inform the CLT.

### The Data Protection group's responsibilities

- Keeping the board updated about data protection responsibilities, risks and issues
- Reviewing all data protection procedures and policies on a regular basis
- Ensuring data protection statements are attached to all forms used to collect personal data, and to all marketing materials
- Addressing any data protection queries from staff, members, volunteers and other stakeholders
- Ensuring all systems, services, software and equipment meet acceptable security standards
- Arranging data protection training and advice for all board members and staff



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- Checking and approving with third parties that handle the company's data any contracts or agreements regarding data processing

The responsibilities of other board members, staff and volunteers (data processors)

- Only to 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 it is necessary to then use password protection
- To report any concerns or breaches to the Data Protection group immediately, and to take remedial steps if necessary

### Subject access requests

A data subject may, subject to certain exceptions, request access to information held about them. There are also restrictions on the information to which a data subject is entitled under applicable law.

### Data portability

A data subject has the right to request 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. There will be no charge for this.

### 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 an exemption applies.

### International data transfers

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

Agreed by Board on	6 July 2021
Chair	Simon Hooton
Secretary	Sian Richards



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Previous Versions	27 August 2019
Next review	July 2023