Kingston St Mary Community Land Trust Ltd.

Privacy Notice

20 November 2023

1 Who we are

1.1 Kingston St Mary Community Land Trust Ltd. (KSM CLT) is a community benefit society, working to secure resources to invest in the long-term future of the communities in the Parish of Kingston St Mary and its surrounds. KSM CLT is a community benefit society registered with the Financial Conduct Authority for England & Wales (Mutuals Registration No: 9095) and in this Privacy Notice the terms "we", "us", "the KSM CLT", or "the Charity" all have this meaning.

1.2 There is a legal duty on all organisations to handle Personal Data appropriately. KSM CLT processes small amounts of Personal Data in pursuit of its objects and for these purposes we adhere to the General Data Protection Regulation (referred to below as the "GDPR"), which came into force on 28th May 2018.

2 Your Personal Data

2.1 Personal Data is information about a living individual who can be identified directly or indirectly. This can be by the information alone or by referring to other available data which, when used in conjunction with the information, identifies the individual.

2.2 This Privacy Notice sets out what Personal Data we record, how we use it and whether it is shared. It also sets out the procedures we have established to enable you to exercise control over the way we manage any Personal Data which relates to you.

2.3 The GDPR sets out a number of purposes for which Personal Data may be held, including Legitimate Interest, Legal Obligation and Consent. Where used in this Privacy Notice, these terms have the same meaning as in the GDPR.

3 Why we use Personal Data

3.1 We use Personal Data in pursuit of our objects to facilitate the small-scale development of affordable homes by the community and for the community of Kingston St Mary as well as other community projects.

This includes managing communications with our members and supporters, maintaining membership lists, offering help to those seeking information or advice about affordable housing, negotiating and contracting with public authorities, companies and individuals supervising the delivery, sale, rental and maintenance of properties which we might own, and maintaining information relating to past and potential donations.

3.2 Where necessary, we also use Personal Data to meet our statutory obligations.

4 What information we collect

4.1 If you are a supporter or member of KSM CLT:

a) We will **record** your name, contact information, address, your shareholding and membership status. In addition, we may record details of any communications between us.

b) We **use** this data on the basis of Legitimate Interest, to maintain records of your shareholding, communicate with you about our work and events, and keep records of your attendance or contributions at our meetings on the business of the Trust.

c) We may **share** your name and a record of your attendance and any contributions at our meetings with other members and statutory bodies. We might also, with your express consent share your electronic address, postal address or phone number at which you can be contacted.

4.2 If you are one of our volunteers:

a) We may **record** your name and contact details, date of birth (if you are under 18), details of your work for the Trust, and any communications between us.

b) We **use** this data on the basis of Legitimate Interest (and where necessary to meet our statutory duties on the basis of Legal Obligation), to contact you in connection with your role, to maintain our accounts and record details of your role and work with us.

c) We may **share** with your express consent your contact details with statutory bodies and third parties where necessary to meet statutory requirements or to enable you to be contacted in connection with your work for us.

4.3 If you use our services, rented or purchased a property from us:
a) We may **record** your name, contact details, date of birth (if you are under 18), details of our service to you or any transactions between us and related payments. We may also record any communications between us.

b) We **use** this data on the basis of Legitimate Interest (and where necessary to meet our statutory duties on the basis of Legal Obligation) to communicate with you in connection with our service to you or the property you have rented or purchased from us, to maintain our accounts, deliver the service or product which you have requested, or meet our contractual obligations.

c) We will **not share** your Personal Data for any other purpose without your express consent.

4.4 If you have made a donation to us:
a) We may **record** your name, contact details, and details of your donation. We may also record any communications between us.

b) We **use** this data on the basis of Legitimate Interest (and where necessary to meet our statutory duties on the basis of Legal Obligation) to maintain our accounts and acknowledge your donation. We may also contact you by email or post about other ways in which you can support our work unless you ask us not to.

c) We will **not share** your Personal Data for any other purpose without your express consent.

4.5 If you have visited our website:
a) We may record pseudonymised data relating to your activity for our own statistical purposes and, with your consent we will set cookies on your machine in accordance with our Cookie Policy (see Section 8 Our website and use of cookies).

b) We use this data on the basis of Legitimate Interest to ensure that your experience, and those of others visiting our website is as straightforward as possible.

c) We will not share your Personal Data for any other purpose without your express consent.

4.6 If you have indicated your wish to be kept informed of our work:
a) We may **record** your name and contact details together with any correspondence between us. We may also record other relevant information which you entered at the time of registration.

b) We **use** this data on the basis of Consent to send you newsletters and other information relevant to our work and connect you with other organisations which can help you achieve your objectives.

c) We may with your express consent **share** your contact details with other organisations which have similar objectives where they may be able to assist you. In the unlikely event that we wish to share or use your Personal Data for purposes outside those set out in this Privacy Notice, we will provide you with a new Privacy Notice explaining this new use and will seek your prior consent in advance of the new processing.

4.7 If you represent a supplier, public body or other organisation relevant to our charitable objects
a) We may **record** your name and contact details together with any correspondence between us and details which are relevant to our charitable purposes. We will obtain this information directly from you, from the organisation which you represent or from other publicly available sources.

b) We **use** this data on the basis of Legitimate Interest and solely in pursuit of our objects.

c) We may **with your express consent** share publicly one or more electronic addresses, postal addresses or phone numbers at which you can be contacted.

4.8 If you have registered to attend one of our events or meetings:
a) We may **record** your name and contact details. We may also record other relevant information which you entered at the time of registration.

b) We **use** this data on the basis of Legitimate Interest (and with your express consent in the case of any "special categories" of data) to ensure that our preparations have due regard for your needs and vital interests.

c) We may **share** this information with others who are involved with the management of the event or meeting which you are attending.

5 How we process Personal Data
a) In all cases we process the minimal amount of Personal Data necessary for the purposes described above.

b) Your Personal Data will be processed by our Data Controller who is the secretary. It may also be processed by suppliers providing supporting services (such as printing and computing services).

6 How long we keep Personal Data
6.1 We will keep your Personal Data no longer than necessary to fulfil the purposes described in this Privacy Notice, except that where the impact on your privacy is minimal, we may keep your Personal Data for longer periods to maintain our historical records and support our heritage.

7 Your rights over your Personal Data
7.1 Unless subject to an exemption under the GDPR, you have the following rights with respect to your Personal Data: -
a) the right to request a copy of personal data which we hold about you;
b) the right to request that we correct any personal data if it is found to be inaccurate or out-of-date;
c) the right to request your personal data is erased where it is no longer necessary for us to retain such data;
d) the right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
e) the right to object to the processing of personal data, (where applicable); and
f) the right to lodge a complaint with the Information Commissioners Office.

7.2 Where you need to exercise one of the rights shown above, please email or write to us at the address in *Section 10 How to contact* us below.

7.3 You also have a right "to be forgotten" and have your Personal Data removed. Please be aware however that if you exercise this right it may affect your membership or our ability to provide services to you, to receive donations from you or to inform you of events or news of interest. If you act as one of our members, suppliers or volunteers it may only be possible for you to exercise this right over Personal Data:

a) which is no longer needed for the purpose for which it was originally recorded; and
b) which we are not legally required to retain.

7.4 Where you wish to exercise the right to be forgotten, please email or write to us at the address in *Section 10 How to contact* us below. We will contact those other individuals or organisations with whom we have specifically shared your Personal Data (see *Section 4 What information we collect* above), instruct them to remove your Personal Data from their records and request from them confirmation that this has happened. To the extent that the law allows, we will ensure your Personal Data is no longer shared with any other person or organisation, although we may not be able to contact the media, the public or third parties who have in the past viewed or copied your Personal Data by virtue of their access to our website or other publicity materials.

8 Our website and use of cookies

8.1 Our website www.kstm.uk uses cookies – small text files that are placed on your machine to enable us to provide information to you, to support navigation through the site, to enable other functions which you may select and to provide anonymised tracking data to third party applications such as Google Analytics.

8.2 Our website will always inform you where cookies are employed and our use of cookies is governed by the Cookie Policy of the Kingston St Mary website (www.kstm.uk), which you may view on our website. We will only set cookies on your machine if you accept our Cookie Policy and website terms of use.

9 Changes to our privacy policy

9.1 We keep our privacy policies under regular review and we may make updates to this Privacy Notice accordingly.

9.2 This Privacy Notice was last updated on 20 November 2023.

10 How to contact us

10.1 If you have a concern or query relating to our use of your Personal Data or this Privacy Notice, please in the first instance contact by post the Secretary of Kingston St Mary Community Land Trust Limited, Park Cottage, Tainfield Park, Nailsbourne, Taunton, TA2 8AE. Alternatively, please email clt@kstm.uk.

10.2 If you are not happy with our response, or you believe that your data protection or privacy rights have been infringed, you can contact the UK Information Commissioner's Office which regulates and enforces data protection law in the UK. Details of how to do this can be found at www.ico.org.uk, or you can contact the Information Commissioners Office on 0303 123 1113 or via email ico.org.uk/global/contact-us/email/ or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.