# Privacy statement - Data Protection Act & General Data Protection Regulation 2018.

To work effectively with you there is a need for HCLT to hold and process some personal information. We will value and protect your privacy and the following is a broad description of the way HCLT processes data. In some cases, you may need to refer to other personal communications or contract with you. You may also contact us about your personal circumstances.

**Nature of our work**: Herstmonceux CLT Limited is a Community Benefit Society regulated by the Financial Conduct Authority. It has been established to acquire and own community assets for the benefit of the community of Herstmonceux. Aims include the provision of homes for the young and older population with a local connection. It can raise finance through grants and commercial institutions and issue shares to members who wish to support the aspirations of HCLT.

**Reasons for processing information:** We process personal information to administer our membership records and activities including share issue and fundraising, to maintain our own accounts and records arising from our activities and engage specialists to help us do this.

## Type of information processed:

Name, telephone numbers, post and email addresses of individuals and organisations contacting HCLT

Number of shares held by an individual and any skills volunteered by them to support HCLT Bank account details for individuals and organisations that have a financial transaction with HCLT Personal information from individuals occupying or seeking to occupy property owned by HCLT

### Who is the information processed about?

We process information about our members, supporters, participants in our activities, sponsors, suppliers and occupiers or lease holders of any asset owned by the HCLT.

## Who the information may be shared with?

We may need to share the information with the individual themselves, and with other organisations directly associated with our activities. When this is necessary, we are required to comply with all aspects of the Data Protection Act (DPA). Examples are:

Where necessary we may share information with family, associates, and representatives of the person whose personal data we process. We may be legally required to divulge information by HMRC, the Financial Conduct Authority or The Courts. Where contracts, agreements or leases require personal information to be disclosed to credit reference agencies for credit worthiness, the individual will be informed and agreement sought. We have a data sharing agreement with Action in Rural Sussex Community Housing Hub to hold our data securely and provide assistance and aggregated data to HCLT. When doing so we will conform to all Data Protection requirements.

## Transferring information overseas:

We do not transfer personal information outside the United Kingdom, save as may occur through our use of secure cloud back-up of files.

## Individual rights.

On request to the Secretary, an individual may ask to see a copy of all their personal data held by HCLT and may request changes or removal. We will respond within 28 days. Where total removal of information conflicts with our legal obligations we will inform the individual.

## HCLT May 2020.