

This document was last updated on 21 April 2024

## Privacy Policy

In accordance with the new General Data Protection Regulations (GDPR), effective 25 May 2018, the Osterley & Wyke Green Residents' Association (hereinafter referred to as "OWGRA") hereby advises members and other individuals who interact with OWGRA of the conditions on which we hold their personal data.

### 1. Definitions

1. Personal data is information about a person which is identifiable as being about them. It can be stored electronically or on paper and includes images and audio recordings as well as written information.
2. Data protection is about how we, as an organisation, ensure we protect the rights and privacy of individuals, and comply with the law, when collecting, storing, using, amending, sharing, destroying or deleting personal data.

### 2. Responsibility

1. Overall and final responsibility for data protection lies with the OWGRA Committee (hereinafter referred to as the "Committee"), who are responsible for overseeing activities and ensuring this policy is upheld.
2. All Committee members, and members of OWGRA, are responsible for observing this policy, and related procedures, in all areas of their work for OWGRA.

### 3. The data we hold

1. OWGRA needs to keep personal data about its committee, members, supporters and other individuals which it interacts with as part of carrying out its legitimate interests (hereinafter referred to as "Personal Data").

2. The Personal Data given when members subscribe includes name, street address, telephone number, email address and subscription status. Where members support OWGRA in specific roles or duties (e.g. Street Rep for a specific street/area), those roles are also recorded as Personal Data.
3. Personal Data held by OWGRA is held in either or both electronic and paper format. All references to Personal Data in this document refer to any such data held in either or both formats.
4. The amounts contributed by members as annual subscriptions, and any other payments made to OWGRA by them, are recorded as Personal Data; but we do not record, nor have access to, any credit/debit card data involved in online subscriptions or donations.
5. Where members become Committee Members we also hold additional Personal Data as required to allow them to undertake their roles in conjunction with other Committee Members.
6. In addition we hold similar Personal Data (as for members) on other individuals where we need to contact these individuals as a part of carrying out OWGRA's legitimate interests as a Residents' Association.
7. We retain correspondence with individuals to enable us to keep track of issues and past events.
8. We record attendance at meetings of the Residents' Association and other public meetings we organise and record appropriate details of matters raised which may include the name of individuals raising or commenting on such matters or otherwise participating at such meetings.
9. We also collect audio recordings of selected public meetings which are placed on our website to allow people who were unable to attend the public meeting to hear what was discussed at the meeting. Any meeting which is recorded will always be stated in the notification of the meeting to be a PUBLIC MEETING and will be open to anyone to attend, including individuals who are not members of OWGRA and/or who have no links with it.

#### 4. How we store your data

1. This Personal Data is stored electronically with appropriate levels of security to prevent unauthorised third-party access.
2. The Personal Data is jointly managed and controlled by the OWGRA Secretary and OWGRA Membership Secretary. They will also provide selected parts of the Personal Data to other members of the OWGRA Committee where they require access to that data to allow them to execute their responsibilities to OWGRA as Committee members. Such extracts of the Personal Data will be destroyed as soon as access is no longer required by the Committee member in undertaking OWGRA's legitimate interests.
3. In addition, OWGRA Members who are Street Representatives will be provided with only those selected subsets of Personal Data related to their street(s) required by them to allow them to undertake their responsibilities. Such data will be destroyed when it is no longer needed.

## 5. How long we keep your data

1. Unless otherwise requested, we will retain this Personal Data on
  - a. OWGRA Members and Committee Members, whilst they continue to subscribe to OWGRA, and
  - b. other individuals and supporters, whilst OWGRA has a need to interact with these individuals as part of its legitimate interests and will update these data as required.
2. For OWGRA Members and Committee Members, we will flag any such Personal Data as “historic” when members advise OWGRA that they have moved out of the area, or when their membership lapses.
3. For Supporters and Other Individuals, we will flag the Personal Data as “historic” when OWGRA no longer needs to maintain contacts with the individuals as part of its legitimate interests.
4. OWGRA will retain all Personal Data flagged as “historic” for a period of 5 years before deleting it.
5. Where Personal Data is provided in paper form (e.g. via completed membership forms), we will retain this form for a period of 5 years for audit and reference purposes, unless instructed to destroy it.
6. Minutes of our meetings, containing details of attendance and matters discussed, will be retained in perpetuity or until it is considered by OWGRA that they are no longer required for record purposes or on the grounds of historical value.
7. Correspondence with individuals on issues and past events will be retained in perpetuity or until it is considered by OWGRA that information on the issue or past event is no longer required for record purposes or on the grounds of historical value.

## 6. How we use your data

1. This Personal Data will be used in subscription collection, notifying members of matters of local interest (e.g. sending out the regular e-newsletter), notifying supporters on matters of interest, recruiting new supporters, members, etc., liaising with other individuals, running OWGRA as a residents’ association, and other purposes as required as part of OWGRA’s legitimate interests.
2. OWGRA will never pass on any of your Personal Data to a third party, whether for commercial or non-commercial reasons. The only exceptions to this are
  - a. Where we are required to provide the information to comply with the law
  - b. Where we have a contract with a third party as part of OWGRA’s legitimate interests and the individual wishes to utilise this contract (e.g. OWGRA has a contract with a T-shirt manufacturer for OWGRA T-shirts, a Member requests a T-shirt and OWGRA orders the T-shirt, providing details of the individual requiring it)
  - c. Where it may protect someone’s life (e.g. with paramedics if someone is not able to communicate for themselves).

## 7. Your access to your data

1. You have the right to know what Personal Data we hold on you. If you wish to know this, you should contact OWGRA formally, either in writing or by email.
2. OWGRA will respond to such a request within 30 days. If you no longer wish us to hold your data, we will delete it. However, we will then no longer be able to contact you, unless you contact us again.

## 8. Your data protection rights

Under data protection law, you have rights including:

1. Your right of access - You have the right to ask us for copies of your personal information.
2. Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
3. Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.
4. Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.
5. Your right to object to processing - You have the right to object to the processing of your personal information in certain circumstances.
6. Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at e-mail: [info@owgra.org.uk](mailto:info@owgra.org.uk), telephone: 07562 385269, if you wish to make a request.

## 9. Our response to data breaches

1. We will endeavour not to have any data breaches.
2. In the event of a data breach, we will endeavour to rectify the breach by retrieving any lost data or incorrectly shared data.
3. Serious data breaches which may risk someone's personal rights or freedoms will be reported to the Information Commissioner's Office within 72 hours, and to the individual(s) concerned.

## 10. Contacting the Association

Contact details are given on the OWGRA website (<https://owgra.org.uk>).

## 11. How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at [info@owgra.org.uk](mailto:info@owgra.org.uk), telephone: 07562 385269.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>