



# EASTINGTON COMMUNITY LAND TRUST (ECLT) LIMITED

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## Policy for Data Privacy

### 1. Data Protection Registrar

ECLT is exempt from registration under the Data Protection Acts, including the new provisions of the May 2018 Act ("the Act"). Attached at Appendix 1 is the result of the on-line Registration Self-Assessment which concludes that ECLT is under no requirement to register.

### 2. Membership Data

The only significant data held by ECLT is the Membership Registered, required by the Financial Conduct Authority and expressed under ECLT Rule G 6.

This data is held in electronic and physical form at the Registered Address, where it must be made available to anyone. Details required by Rule G 6 are name, address and date joined. Members are only removed from the register if they resign, are expelled or die. Data retention is therefor covered by Rule G 6. The E-mails of all members are held for internal communication but not displayed on the public register.

### 3. Re-use of membership data

ECLT undertakes not to share the contents of the Membership register with any third party, save for the requirement to display the public copy of the printed register under Rule G 6.1.

### 4. Admission Form for new members

The Admission Form contains the following Privacy statement to comply with the Act

"DATA PROTECTION: Members details will be maintained for ECLT contact purposes and to fulfil Rule G 6.1. Data will not be provided in electronic or physical form to any outside body for any other purpose."

### 5. Financial Data

No personal financial data of any kind is captured. Should this become necessary, this Policy would be reviewed.

### 6. Lettings Assistance

In the event that a partner Housing Association shares personal, non-financial data for the purposes of verifying Local Connections for a specific property, ECLT will not hold permanent records of such data beyond two weeks of that property being notified by the partner HA as being satisfactorily let.

**APPROVED by Board Meeting 3<sup>rd</sup> September 2020, minute 5.2**

Tom Morrison, Chair.....

# Registration self-assessment

[↻ Start again](#)

1. Do you use CCTV for the purposes of crime prevention?

**No**

[Change this answer](#)

2. Are you processing personal information?

**Yes**

[Change this answer](#)

3. Do you process the information electronically?

**Yes**

[Change this answer](#)

4. Is your organisation responsible for deciding how the information is processed?

**Yes**

[Change this answer](#)

5. Do you only process information for one of the following purposes?

**Yes**

[Change this answer](#)

## You are under no requirement to register

Organisations or individuals who only process personal data for judicial functions, to [maintain a public register](#) or for domestic or recreational reasons are exempt. You therefore do not have to register with the ICO.

However, it is important that you continue to [adhere to the principles of the Data Protection Act \(DPA\)](#) and understands best practice for managing information. To help ensure you are complying with the DPA, we have produced a range of [training materials](#) including practical toolkits, training videos and more.

You can still [register voluntarily](#) if you wish.