



## General Data Protection Regulation – May 2018

# DATA PRIVACY NOTICE

**Westbury Community Shop & Café Registered in England and Wales No: 7010**

**Registered Address:**

**Westbury Village Hall, Playing Field Road, Westbury, Brackley, Northamptonshire, NN13 5JN.**

### **1. Personal data – what is it?**

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession. The processing of personal data is governed by the General Data Protection Regulation 2018 (GDPR).

### **2. Who are we?**

Westbury Community Shop & Café (WSC) is the data controller (contact details below). This means it decides how personal data is processed and for what purposes.

### **3. How do we use and keep personal data?**

WSC complies with its obligations under the General Data Protection Regulations 2018 (GDPR) by keeping personal data (as supplied by our members) up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

We may use personal data for the following purposes: -

- To administer the Shareholder Register - inform shareholders of Annual and Extraordinary Members Meetings and related shareholder issues and provide news and information on events and activities at WSC
- To administer volunteer records - inform volunteers on matters relating to WSC business and provide news and information on events and activities at WSC.
- To administer customer accounts
- To manage our employees
- To administer supplier records

#### **4. What is the legal basis for using and keeping personal data?**

- Processing is necessary for carrying out obligations under company, employment, social security or social protection law.
- Processing is carried out by a Community Interest Company with commercial and community aims provided that:
  - a) the processing relates only to members or former members (or those who have regular contact with it in connection with those aims)
  - b) there is no disclosure of personal data to a third party without consent.
- The legal basis for processing personal data of the various members' groups is as follows:
  - a) Shareholders - compliance with legal obligation under a community benefit society and/or company law
  - b) Volunteers – legitimate interest including commercial benefit and individual interest under social protection law
  - c) Employees– a contract with the individual to fulfil obligations under an employment contract
  - d) Customer account holders - a contract with the individual to supply goods or services
  - e) Suppliers - legitimate interest for commercial benefit
  - f) Members of the public (plus volunteers/staff) – legitimate interest for use of CCTV images to assist the police with criminal investigations and maintain public safety.

#### **5. Sharing personal data**

Personal data will be treated as strictly confidential and will only be shared with other members of WCS for purposes connected with the running of WCS. We will never share personal data with third parties outside the WCS organisation unless we have obtained prior consent.

#### **6. How long do we keep personal data?**

We keep data in accordance with the following guidelines:

- a) Shareholder data will be kept as required by the rules of a community benefit society and/or company law.
- b) Volunteer data will be kept for up to two years after a volunteer's last working shift
- c) Employee data will be kept as required by employment law
- d) Customer account data will be kept for as long as required by HMRC
- e) Supplier data will be kept for as long as required by HMRC
- f) CCTV images will be kept for as long as required by the police

## **7. Individual rights and personal data.**

Unless subject to an exemption under the GDPR, an individual member has the following rights with respect to their personal data:

- The right to request a copy of their personal data held by WCS
- The right to request that WCS corrects any personal data if it is found to be inaccurate or out of date
- The right to request that personal data is erased where it is no longer necessary for WCS to retain such data
- The right, where there is a dispute in relation to the accuracy or processing of personal data, to request a restriction is placed on further processing
- The right to lodge a complaint with the Information Commissioners Office.

## **8. Further processing.**

If we wish to use personal data for a new purpose, not covered by this Data Protection Notice, then we will provide members with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek members' prior consent to the new processing.

## **9. Contact Details.**

To exercise all relevant rights, queries or complaints please in the first instance contact the Chairman of Westbury Community Shop and Café;

**Westbury Community Shop and Café**  
**Playing Field Road**  
**Westbury**  
**NN13 5JN**

You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.