



Hook Norton Low Carbon Limited

e-mail: info@hn-lc.org.uk

www.hn-lc.org.uk

Data Protection Policy

Hook Norton Low Carbon Limited (HNLC) needs to record certain information relating to its members in order to carry out its day to day operations, to meet its objectives and to comply with legal obligations. We are committed to processing data in accordance with our responsibilities under the 2016 General Data Protection Regulation (GDPR). To that end, we will treat information relating to all members and other interested parties with the utmost care and confidentiality. With this policy, we ensure that we gather, store and handle data fairly and transparently and with respect towards individual rights. The administrator and any appointed representative must follow this policy, and The Board of Directors will be responsible for ensuring that HNLC meets its legal obligations.

HNLC agrees to comply with Article 5 of the GDPR, which requires that personal data shall be:

- processed lawfully, fairly and in a transparent manner in relation to individuals;
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- accurate and, where necessary, kept up to date - every reasonable step must be taken to ensure that personal data that is inaccurate, is erased or rectified without delay;
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; and
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures and not transferred to other countries without adequate protection.

What Data do we hold?

	Name	Address	Email	Phone	Area of Interest	DOB	Nationality	CV	Car Registration	Driving Licence info	National Insurance Number	Health info	Telematics Data	Financial Background info
HNLC Members	Y	Y	Y	Y	Y									
Board Members	Y	Y	Y	Y	Y	Y	Y	Y						
Biodiesel Users	Y	Y	Y	Y					Y					
Car Club Users	Y	Y	Y	Y		Y				Y	Y	Y	Y	
E-Bike Users	Y	Y	Y	Y		Y								
Loan Scheme	Y	Y	Y	Y		Y								Y
Oil Syndicate	Y	Y	Y	Y										

Where did the information come from?

- Members supply the information during the application process and agree to it being stored on a database.
- Car Club Members agree to information being collected from external sources such as DVLA.
- Telematics Data is supplied by equipment on the Car Club Vehicles for Insurance purposes (agreed to in the T&C's).

Where is the Data held?

- Data is stored on word or excel documents in Dropbox folders that are password protected and only accessible to the Administrator and Secretary.
- The Administrator also stores the information on a PC and a lap top that are both password protected.
- Paper copies of some information (Loan and Membership Applications) are held by the Administrator.

Who has access to it?

- Administrator – Diana Barber
- Secretary – Tim Lunel
- Car Club Co-ordinator – Anthony Ackner (Car Club Data only)

Why do we hold it?

- We hold this information for the legitimate interests of HNLC :
 - Contacting Members about activities, events and changes to services.
 - Forwarding items of news or services provided by others that are in keeping with HNLC’s objectives
 - Invoicing members for services.
 - Contractual requirements.

How long do we hold the data for?

- Member’s data is held for as long as they are a member of HNLC or the specific activity the data was collected for.

How do Members know what data is held and why it is held?

- HNLC has a Privacy Policy available to all members and linked to on its website.

What is the process if someone wants their data amended/reduced/removed?

- Members are asked to email admin@hn-lc.org.uk with instructions about amendments or removal of personal data.
- This information is given in the privacy Policy and attached as a footer to all Membership emails.
- The Administrator is responsible for making such amendments.

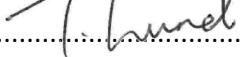
How is Data dealt with when it is no longer required?

- Personal data will not be retained by HNLC any longer than is necessary for the original purpose for which it was given, nor used for any further future undisclosed purpose, nor without the expressed permission of the person to whom that data relates.
- Electronic personal data will be permanently deleted when no longer needed.
- Paper copies of personal data will be shredded when no longer needed.

What is the process if there is a security breach?

- In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, HNLC shall promptly assess the risk to people’s rights and freedoms and if appropriate report this breach to the individuals concerned and the Information Commissioner’s Office (ICO) if appropriate. An investigation will take place to ascertain how and why the breach occurred and a process will be put in place to prevent reoccurrence.

This Policy was ratified by HNLC Board Members on 16th May 2020

[Print Name] Tim Lunel [Signature]..... 

[Position Held] Company Secretary

This Policy shall be reviewed on an annual basis and amended as necessary