**Calder Valley Community Land Trust Ltd**

**Data Protection Policy**

**Approved 9 April 2018**

Calder Valley Community Land Trust Ltd commits to full compliance with the requirements of the Data Protection Act 1998 and the General Data Protection Regulation, in force from 2018.

Calder Valley CLT will follow procedures to ensure that all trustees and staff/consultants are fully aware of and abide by their duties under data protection legislation.

Calder Valley CLT currently maintains the following records covered by data protection legislation:

* electronic records of the society’s members, including addresses, email addresses (where supplied), telephone numbers (where supplied), Gift Aid pledges (where signed) and information on any donations made
* paper records of pledges made for the forthcoming community share issue
* an online database hosted by Mailchimp used for online mailings and marketing.

**Direct marketing**

Although the society believes that all email addresses collected before March 1st 2018 were from those voluntarily offering their contact details in order to keep informed of the society’s activities, formal ‘opt in’ confirmation of this was not sought at the time. The society therefore operates on the basis of ‘legitimate interest’ when sending mailings to these email addresses while ensuring that every mailing provides recipients with a straightforward ‘unsubscribe’ facility.

All email addresses collected after March 1st 2018 will be on the basis that individuals are adequately advised of the use the society intends to make of this information and that individuals therefore have agreed to opt in to receiving information.

**Fundraising**

The society does not use personal data collected from individuals for fundraising purposes of any kind.

**Third parties**

The society undertakes not to sell or pass its databases to third parties.

**Website**

The society does not make use of information collected on its website by cookies

**Data Controller**

The society has appointed its Secretary (Andrew Bibby) as Data Controller.

The society notes that, as a charity, it does not currently need to register with the Information Commissioner.

**Review of this policy**

This policy will be reviewed regularly by trustees, and in particular following the conclusion of the 2018 community share issue and at such time as the society has its first tenants.