

## Privacy Policy – updated May 2018

Transition Homes Community Land Trust aims to be clear and transparent about how we use personal data. This privacy policy tells you what personal data we collect, how we use it, and your rights relating to our use of your data.

### Who we are

Transition Homes Community Land Trust (CLT) is a Registered Charity (1161033) and Company Limited by Guarantee (07849843).

### Data protection overview

Data protection legislation applies to ‘personal data’ (data that relates to an individual, such as a name, address, email or phone number) and regulates how that data is collected, held and processed.

Data protection in the UK is currently governed by the Data Protection Act 1998 (the “DPA”), and from the 25th May 2018 by the new General Data Protection Regulation (GDPR). For the purposes of the DPA, Transition Homes CLT is the ‘data controller’ (i.e. the organisation that is responsible for and controls the processing of personal data). We are registered as a data controller in accordance with United Kingdom Data Protection Act 1998.

### What information do we collect about you?

Ways in which we collect personal data:

- when you sign up to our newsletters and mailing lists
- through voluntary surveys completed either online or on paper
- if you become a member or a supporter of the Community Land Trust
- website usage information is collected using cookies

Personal data may include:

- Your name and email address (e.g. for our mailing list)
- Your address (if you complete a survey, or are a member or supporter)
- Household information e.g. housing need or household composition (if you have completed a survey)
- Bank account information (if you are a supporter or have made a loan to the CLT)
- Information which is transmitted automatically from your computer when you browse the Internet and use our website or mailing list (via Mailchimp). This includes information from cookies (which are described in the section below on Cookies).

### How do we use your personal data?

We use your personal data to help us further our aims of delivering affordable sustainable housing, and to keep you informed of our activities, including:

1. Sending you emails (via Mailchimp or personally) to keep you informed of our activities;
2. Managing your donations or loans to us (if you are a Supporter or Funder);
3. Understanding your housing need (from surveys) in order to contact you with information about potential housing opportunities;



4. Analysing local housing need data in order to provide appropriate housing schemes or to demonstrate housing need to e.g. funders;
5. Responding to or fulfilling any requests, complaints or queries you make to us.

We also may use the information collected automatically, such as your IP address and information stored via cookies, to gather statistics about the number of people who visit our website or use our mailing list and look at the demographics of our website & mailing list users (such as location). Data will not be identifiable.

If you contact us directly, we will use the information you give to us to handle your enquiry or request. This may include responding to your query or feedback, or sending you relevant information. Unless you sign up to our newsletter using the form on the website, via a sign-up form at an event or give written consent via email, you will not receive any further mailings other than a reply to your enquiry. If you would like to stop receiving further mailings from us, you can unsubscribe from our newsletters using the unsubscribe link on every email newsletter.

### **Mailchimp**

When you subscribe to our email list you need to be aware that you are consenting to the following:

- Transfer of your contact information to MailChimp
- Storing your contact information in our MailChimp account
- Sending you emails from our MailChimp account
- Tracking your interactions with our emails

### **Why we use your information**

We will only use your information where we have a legal basis to do so and will always respect your rights.

Where we use your information, it is generally because you have consented to us doing so in order to provide a service to you (to give you information or for the provision of housing) or it may be because we consider we have a legitimate interest to do so. Where we rely on a legitimate interest to use your information, we will always ensure that this is done in a way so as not to be intrusive and that respects your rights. Other reasons may include using information because we have a legal obligation to do so or because we have to fulfil contractual obligations (regarding provision of housing to you).

### **How long we keep your data**

For as long as you want to remain on our mailing list, be a member, or support us, we will keep your contact information. We keep data relating to any financial transactions, including e.g. supporter's details, tenancy information, for 6 years. For non-financial data, e.g. for housing needs surveys, personal data will be kept for 2 years.

### **Will we share your personal data?**

No identifiable data is shared with third parties. Anonymised summary data from surveys may be shared with the local authority, Homes England, grant funders, or other appropriate non-commercial organisations with an interest in affordable housing, to for example demonstrate the level of local housing need or interest in the scheme.

We will never share your personal data with anyone outside of Transition Homes CLT, except when required to do so legally i.e. to law enforcement agencies, or unless you have expressly requested us to do so.



### **How can you access, delete, or amend your personal data?**

Under EU data protection regulations (GDPR) individuals have specific rights regarding their personal data:

- The right to be informed about how personal data is being used
- The right to access one's personal data
- The right to prevent use of personal data
- The right to correct or erase personal information

You can ask us what personal data we hold about you, and we will let you know within 30 days. You can also ask us to correct or erase your personal information.

### **Right to Withdraw Consent at any time**

Where we use your personal information based on your prior consent, such as where you have given us permission to send you communications by email, you can withdraw your consent at any time by contacting us (or unsubscribing from our emails).

### **Right to complain to the Information Commissioner's Office (ICO)**

You have the right to be confident that we handle your personal information responsibly and in line with good practice. If you have a concern about the way we are handling your information, then in the first instance you should raise this with us. We will take your concern seriously and work with you to try to resolve it. However if you are still unhappy with our response you can raise a concern with the ICO, the UK data protection regulator - see the links below for details:

[ico.org.uk/for-the-public/raising-concerns](https://ico.org.uk/for-the-public/raising-concerns) and [ico.org.uk/concerns](https://ico.org.uk/concerns)

### **Cookies**

Cookies are small text files placed on your computer to collect standard internet log information and visitor behaviour information. For further information visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

How do we use Cookies?

We use Google Analytics to help analyse use of our website. This analytical tool uses 'cookies', which are text files placed on your computer, to collect standard internet log information and visitor behaviour information in an anonymous form. The information generated by the cookie about your use of the Website (including your IP address) is transmitted to Google. This information is then used to evaluate visitors' use of the Website and to compile statistical reports on Website activity for us.

We will not (and will not allow any third party to) use the statistical analytics tool to track or to collect any personally identifiable information of visitors to our Website.

You can set your browser not to accept cookies and the above websites tell you how to remove cookies from your browser. However in a few cases some of our website features may not function as a result.

### **Other Websites**

The present Transition Homes website is a subpage of the Transition Town Totnes website, and both occasionally contain links to other websites. This privacy policy only applies to [www.transitiontowntotnes.org](http://www.transitiontowntotnes.org) and [www.transitionhomes.org.uk](http://www.transitionhomes.org.uk) websites so when you link to other websites you should read their own privacy policies.



### **Security and confidentiality**

We take appropriate organisational and security measures to safeguard your personal data against unauthorised or unlawful processing and against accidental loss, destruction, or damage. Our objective is to protect your personal data as follows:

- Access to your personal data is permitted only to those Transition Homes employees and nominated Trustees that need to access the information for the purposes outlined in this privacy policy.
- All those Transition Homes' employees and Trustees accessing personal data are informed of their obligations under the DPA and the restrictions in place on their use of the personal data.
- Written data are stored in a lockable cabinet accessible only by the Data Controller and nominated Trustee/s.
- Electronic data are stored on password-protected computers with appropriate back-up against loss via Dropbox. Mailchimp, SurveyMonkey and Dropbox are also bound by GDPR regulations.

We cannot control any illegal and/or unforeseen activity of other users that may allow them to get around the privacy or security settings on Mailchimp, Dropbox or SurveyMonkey or of our website. Consequently, you acknowledge that there are circumstances in which your personal data may be accessed by unauthorised persons.

### **Changes to Our Privacy Policy**

We keep our privacy policy under regular review and we will place any updates on our web page. This privacy policy was last reviewed on 17<sup>th</sup> May 2018.

### **How to Contact Us**

If you have any questions, comments or requests in relation to this privacy policy, your personal data, or data protection generally, or would like to access, amend, or delete your personal data, please contact us:

By post: Transition Homes Community Land Trust, The Mansion, 36a Fore St, Totnes, Devon, TQ9 5RP

By email: [info@transitionhomes.org.uk](mailto:info@transitionhomes.org.uk)

By phone: 01803 867358 (please ask to speak to our coordinator, Nicola Lang)