

## **Exelby Green Dragon Community Pub Ltd**

### **Data Privacy Notice**

#### **Who are we?**

Exelby Green Dragon Community Pub Ltd (“we” or “the Society” or “EGDCP”) is registered with the Financial Conduct Authority under the Co-operative and Community Benefit Societies Act 2014, Reg No. 7599 and our registered address is Garth House, Exelby, Bedale, North Yorkshire, DL8 2HD.

#### **What personal data does EGDCP hold?**

We collect personal data from the Members (shareholders) of the Society, non-Members (individuals who have expressed an interest in the activities of the Society) and volunteers (Members or non-Members who help the Society to achieve its aims). The personal data we hold consists of names and contact details (including postal address, phone numbers and email address). For Members, the personal data we hold also includes details of shareholdings and bank account information. If we change the extent of the personal data we hold, we will inform you.

#### **Why does EGDCP hold this personal data?**

We hold this personal data so that we can communicate information about the aims and activities of the Society to interested parties. Additionally, for Members, we hold information about shareholding, values and means of payment so we can properly administer our register of Members, inform Members about Society meetings and other Society business, and for the purpose of distributing interest payments as and when these are agreed by the management committee.

#### **How has the Society acquired this personal data?**

You, Members and non-Members, have provided your personal data on Share Application forms and/or by expressions of interest in the aims and activities of the Society. We have not acquired personal data from any third-party source.

#### **How do we use personal data?**

We use personal data to:

- Administer the Society and its Membership
- Produce accounts and records
- Generate mailshots (physical and electronic) informing you of the Society’s activities monitoring delivery and response
- Produce formal communications to our Members
- Communicate with our volunteers

We analyse the personal data we hold based on:

- Location (village, city, region, country) of the individual
- Financial investment by Members in the Society, by way of shares
- Specific interests expressed by individuals (potential future use)

We use data to target our communications appropriately to Members and non-Members, and to report our activities effectively to our Members.

We do not use any automated methods for analysing personal data for decision making or profiling.

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

For non-Members, we keep your personal data until you opt out from receiving our communications. For Members, we keep your personal data during your membership of the Society. If you withdraw your shares (subject to the Rules of the Society) and thus end your membership, we will retain your personal data relating to your past shareholding to the extent that we are required to do so by the relevant authorities.

### **Who has access to and/or processes the personal data?**

The personal data is accessed and processed only by Officers of the Society (Treasurer and Secretary). No other person has access to the personal data held by us. We will not share personal data with any third party without first obtaining your express permission which will be recorded in writing including by email.

### **Legitimate interest and withdrawal of consent**

It is in the legitimate interests of the Society to collect and process the personal data of Members and non-members, as described in this Notice: both our Members and non-Members have provided personal data in the form of contact information in the expectation that we will communicate with them about the plans and activities of the Society. Our Members have provided additional personal data because it is needed for the Society to maintain the required level of information about its shareholders, as described above. As the extent of the personal data we hold is very limited, there is minimal potential impact on your privacy. If you are a non-Member and buy shares in the Society (i.e. become a Member), you will have to provide certain additional personal data so that we can properly administer the Society's Register of Shareholders. In all communications, we will provide a simple mechanism for you to opt-out of future communications (except where keeping that information is a requirement of your Membership of the Society).

### **Can I see my personal data?**

Yes, on request, we will send you a copy of your personal data that we hold. We will not make a charge for this service except where it is excessively requested.

### **Security of personal data**

We protect your personal data that we hold against loss or unauthorised access through use of backup and secure passwords.

### **Your right to complain**

You have a right to complain about our collection, retention or processing of your personal data. If you wish to complain, we ask that you first do so to the Secretary of the Society so that we may try to resolve your complaint within the Society. Please email the Secretary at [egdcpltd@gmx.co.uk](mailto:egdcpltd@gmx.co.uk) or contact us by post or through our website.

Should you so wish, you may always complain to the supervisory body for data protection in the UK which is the Information Commissioners Office (ICO). See: <https://ico.org.uk/concerns/>

### **Notice agreed by the Board of EGDCP Ltd 11-06-2019**