

**Ledbury and Area Development Trust Limited**  
**General Data Protection Regulation**  
**POLICY**

- 1 The Ledbury and Area Development Trust Limited (LADT) is the Data Controller. All personnel are responsible for ensuring compliance with the General Data Protection Regulations.
- 2 LADT will not collect or store 'Sensitive Personal Data'. Should Sensitive Personal Data be received it shall be deleted and the sender informed.
- 3 No Data will stored relating to persons under 16, even if the age of consent in the Regulation is lower than 16.
- 4 LADT will not create or maintain databases or directories containing personal data.
- 5 LADT will not exchange (supply or receive) any personal data with another Data Controller, other than to comply with legislation.
- 6 LADT will not ask others to process personal data on their behalf.
- 7 LADT will not pass personal data to a third party except where required by legislation.
- 8 LADT will set out the lawful basis for processing personal data, inform people of how we use their data and how they may view their data.
- 9 LADT personnel shall provide and use an independent personal email address and use it for all LADT related business. This account shall only be used for LADT related business. This email address shall not be used for, or be associated with, social media sites.
- 10 LADT personnel will maintain up to date anti-virus software on computers used on LADT related work.
- 11 LADT shall not use social media.
- 12 LADT Chairman plus at least one of the Company Secretary, Vice Chairman will examine any alleged data breaches.
- 13 Requests for subject data to be supplied or deleted are to be sent to the Company Secretary who will follow the Subject Access Policy and Process, in liaison with the management team as necessary.

**Ledbury and Area Development Trust Limited**  
**General Data Protection Regulation**  
**SUBJECT ACCESS REQUESTS POLICY and PROCESS**

- 1 LADT will provide an easily accessible method for submitting Subject Access Requests (SARs).
- 2 LADT will not charge for responding to SARs.
- 3 LADT will maintain internal procedures for handling SARs.
- 4 On receipt of a subject access request forward it to the Company Secretary, who will;
  - a. verify the request has been made under the Data Protection legislation;
  - b. verify the identity of the data subject; by such means as appears appropriate given the data held;
  - c. verify the access request is clear what personal data is requested; if not request additional information;
  - d. verify the access request does not include other subjects' data or redact it;
  - e. verify the request is not unfounded or excessive; and if so, consider a refusal to act on the request;
  - f. keep the subject informed of progress;
  - g. supply the data requested in an intelligible form within one month
  - h. inform and keep up to date, the Chairman and Vice Chairman.
- 5 When a requestor is not satisfied with a response to a SAR, LADT will treat this as a complaint.
- 6 Complaints will be considered by the Chairman, Vice Chairman and Company Secretary who will consider the complaint.
- 7 Responses to complaints will advise the requestor they may complain to the Information Commissioners Office ("ICO") if they remain unhappy with the outcome.

**Ledbury and Area Development Trust Limited**  
**General Data Protection Regulation**  
**PRIVACY POLICY**

**Your personal data – what is it?**

“Personal data” is any information about a living individual which allows them to be identified from that data (for example a name, photographs, videos, email address, or address). Identification can be by the personal data alone or in conjunction with any other personal data. The processing of personal data is governed by legislation relating to personal data which applies in the United Kingdom including the General Data Protection Regulation (the “GDPR”) and other local legislation relating to personal data and rights such as the Human Rights Act.

**LADT information**

This Privacy Policy is provided to you by LADT which is the data controller for your data. Contact details are provided at the bottom of this document

LADT forms the Data Controller.

**What personal data is collected?**

- Names, titles, and aliases,
- Contact details such as telephone numbers, addresses, and email addresses;
- Interaction with email messages and telephone calls

**LADT will comply with data protection law. This says that the personal data we hold about you must be:**

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept and destroyed securely including ensuring that appropriate technical and security measures are in place to protect your personal data to protect personal data from loss, misuse, unauthorised access and disclosure.

**We use your personal data for some or all of the following purposes:**

- To support regeneration in and around Ledbury
- To confirm your identity to provide some services;
- To contact you by post, email, telephone
- To help us to build up a picture of how we are performing;
- To enable us to meet all legal and statutory obligations and powers
- To promote the interests of LADT;
- To maintain our own accounts and records;
- To seek your views, opinions or comments;
- To notify you of changes to our facilities, services, events and staff, management team and role holders;
- To send you communications which you have requested.
- To process relevant financial transactions.

**What is the legal basis for processing your personal data?**

To carry out LADT’s business of supporting regeneration. To do this effectively it may need contact you. When necessary we will first obtain your consent to use your personal data.

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**PRIVACY POLICY**

**Sharing your personal data**

LADT will not share the General Public's data. Personal data of staff and tenants may be shared where required by legislation, to carry out LADT's work or as a requirement of, or associated with, employment.

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

We will keep records permanently if we are legally required to do so. We may keep other records for an extended period of time in accordance with best practice (e.g. HMRC audits) and to defend or pursue claims. In general, we will endeavour to keep data only for as long as we need it and to delete it when it is no longer needed.

**Your rights and your personal data**

You have the following rights with respect to your personal data:

When exercising any of the rights listed below, in order to process your request, we may need to verify your identity for your security. In such cases we will need you to respond with proof of your identity before you can exercise these rights.

- (i) The right to access personal data we hold on you
- (ii) The right to correct and update the personal data we hold on you
- (iii) The right to have your personal data erased
- (iv) The right to object to processing of your personal data or to restrict it to certain purposes only
- (v) The right to data portability
- (vi) The right to withdraw your consent to the processing at any time for any processing of data to which consent was obtained
- (vii) The right to lodge a complaint with the Information Commissioner's Office. See contact details.

**Transfer of Data Abroad**

Any personal data transferred to countries or territories outside the European Economic Area ("EEA") will only be placed on systems complying with measures giving equivalent protection of personal rights either through international agreements or contracts approved by the European Union. Our website is also accessible from overseas.

**Further processing**

If we wish to use your personal data for a new purpose, not covered by this Privacy Policy, then we will provide you with a Privacy 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 your prior consent to the new processing.

**Changes to this policy**

We keep this Privacy Policy under regular review and we will place any updates on this web page [www.ledburyadt.org](http://www.ledburyadt.org) This Policy was last updated in May 2018.

**Contact Details**

Please contact us if you have any questions about this Privacy Notice or the personal data we hold about you or to exercise all relevant rights, queries or complaints at:

The Company Secretary, Studio 3, Old Cottage Hospital Studios, The Homend, Ledbury, Herefordshire, HR8 1ED. Tel: 01531 636304. E-mail: [enquires@ledburyadt.org](mailto:enquires@ledburyadt.org)

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

**Ledbury and Area Development Trust Limited**  
**General Data Protection Regulation**  
**General Public Privacy Notice**

**Introduction**

The processing of personal data is governed by legislation including the General Data Protection Regulation (the "GDPR"). "Personal data" is any information about a living individual which allows them to be identified from that data either directly or when combined by with other information.

This Privacy Notice is provided to you by the Ledbury and Area Development Trust Limited who is a data controller. The personal data LADT processes and for what purposes is set out in this Privacy Notice.

**LADT will process all or some of the following personal data where necessary to perform its tasks:**

- Names, titles, and aliases;
- Contact details such as telephone numbers, addresses, and email addresses;

**LADT will comply with data protection law. This says the personal data we hold must be:**

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept and destroyed securely including ensuring that appropriate technical and security measures are in place to protect your personal data to protect personal data from loss, misuse, unauthorised access and disclosure.

**We use your personal data of the general public for some or all of the following purposes:**

- To carry out the duties of LADT.
- To record your views, opinions or comments and to respond where appropriate.

**What is the legal basis for processing your personal data?**

To carry out LADT's business of supporting regeneration. To do this effectively it may need contact you. When necessary we will first obtain your consent to use your personal data.

**LADT does not exchange or share General Public data with anyone.**

**LADT does not collect or store any Sensitive Personal Data**

**LADT does not 'process' personal data except under specific separate Privacy Notices.**

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

We retain personal data for as long as we believe it is necessary to be able to serve LADT.

**Your rights and your personal data**

You have the following rights with respect to your personal data:

We may need you to provide proof of your identity before you can exercise these rights. We will carry out requests within one month.

**1. The right to access personal data we hold on you**

Please contact LADT to request the personal data we hold on you as well as why we have the data, who has access to it and, if known, where we obtained the personal data from.

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**2. The right to correct and update the personal data we hold on you**

If the data we hold on you is out of date, incomplete or incorrect, you can inform us and your data will be updated.

**3. The right to have your personal data erased**

If you feel that we should no longer be using your personal data or that we are unlawfully using your personal data, you can request that we erase the personal data we hold.

**4. The right to object to processing of your personal data or to restrict it to certain purposes only**

You have the right to request we stop processing your personal data or ask us to restrict processing.

**5. The right to data portability**

You have the right to request we transfer some of your data to another controller. We will comply with your request, where it is feasible to do so, within one month of receiving your request.

**6. The right to withdraw your consent to the processing at any time for any processing of data to which consent was obtained**

Please contact tLADT by telephone, email, or by post

**7. The right to lodge a complaint with the Information Commissioner's Office.**

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.

**Transfer of Data Abroad**

LADT does not transfer abroad. However, our website is accessible from overseas.

**Further processing**

A further Privacy Notice will be provided for any new use of data. Where necessary, we will seek your prior consent to the new processing.

**Changes to this notice**

We keep this Privacy Notice under regular review and we will place any updates on [www.ledburyadt.org](http://www.ledburyadt.org) This Notice was last updated in May 2018.

**Contact Details**

Please contact us if you have any questions about this Privacy Notice or the personal data we hold about you or to exercise all relevant rights, queries or complaints at:

The Company Secretary, Studio 3, Old Cottage Hospital Studios, The Homend, Ledbury, Herefordshire, HR8 1ED. Tel: 01531 636304. E-mail: [enquires@ledburyadt.org](mailto:enquires@ledburyadt.org)

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

**Ledbury and Area Development Trust Limited**  
**General Data Protection Regulation**  
**PRIVACY NOTICE for Staff<sup>1</sup> and Role Holders<sup>1</sup>**

**Introduction**

The processing of personal data is governed by legislation including the General Data Protection Regulation (the "GDPR") and other legislation. "Personal data" is any information about a living individual which allows them to be identified either directly using the data or by combining it with other information which helps to identify a living individual.

This Privacy Notice is provided to you by **LADT** which is the data controller for your data.

**LADT works together with:**

Other data controllers, such as local authorities, public authorities, central government and agencies such as;

- HMRC and DVLA
- Staff pension providers
- Former and prospective employers
- DBS services suppliers
- Payroll services providers
- Recruitment Agencies
- Credit reference agencies

We may need to share personal data we hold with them so that they can carry out their responsibilities to the LADT and our community.

**LADT will comply with data protection law. This says that the personal data we hold about you must be:**

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept and destroyed securely including ensuring that appropriate technical and security measures are in place to protect your personal data to protect personal data from loss, misuse, unauthorised access and disclosure.

**What data do we process?**

- Names, titles, and aliases, photographs.
- Start date / leaving date
- Contact details such as telephone numbers, addresses, and email addresses.
- Where they are relevant to our legal obligations, or where you provide them to us, we may process information such as gender, age, date of birth, marital status, nationality, education/work history, academic/professional qualifications, employment details, hobbies, family composition, and dependants.
- Non-financial identifiers such as taxpayer identification numbers, staff identification numbers, tax reference codes and national insurance numbers.
- Financial identifiers such as bank account numbers, payment card numbers, payment/transaction identifiers, policy numbers, and claim numbers.
- Financial information such as National Insurance number, pay and pay records, tax code, tax and benefits contributions, expenses claimed.
- Other operational personal data created, obtained, or otherwise processed in the course of carrying out our activities, including but not limited to, recordings of telephone conversations, IP addresses and website visit histories, logs of visitors, and logs of accidents, injuries and insurance claims.
- Next of kin and emergency contact information
- Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process and referral source (e.g. agency, staff referral))
- Location of employment or workplace.
- Other staff data (not covered above) including; level, performance management information, languages and proficiency; licences/certificates, immigration status; employment status; information for disciplinary and grievance proceedings; and personal biographies.
- Information about your use of our information and communications systems.

**We use your personal data for some or all of the following purposes: -**

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**General Data Protection Regulation**  
**PRIVACY NOTICE for Staff<sup>1</sup> and Role Holders<sup>1</sup>**

Please note: We need all the categories of personal data in the list above primarily to allow us to perform our contract with you and to enable us to comply with legal obligations.

- Making a decision about your recruitment or appointment.
- Determining the terms on which you work for us.
- Checking you are legally entitled to work in the UK.
- Paying you and, if you are an employee, deducting tax and National Insurance contributions.
- Providing any contractual benefits to you
- Liaising with your pension provider.
- Administering the contract we have entered into with you.
- Management and planning, including accounting and auditing.
- Conducting performance reviews, managing performance and determining performance requirements.
- Making decisions about salary reviews and compensation.
- Assessing qualifications for a particular job or task, including decisions about promotions.
- Conducting grievance or disciplinary proceedings.
- Making decisions about your continued employment or engagement.
- Making arrangements for the termination of our working relationship.
- Education, training and development requirements.
- Dealing with legal disputes involving you, including accidents at work.
- Ascertaining your fitness to work.
- Managing sickness absence.
- Complying with health and safety obligations.
- To prevent fraud.
- To monitor your use of our information and communication systems to ensure compliance with our IT policies.
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.
- To conduct data analytics studies to review and better understand employee retention and attrition rates.
- Equal opportunities monitoring.
- To undertake activity consistent with our statutory functions and powers including any delegated functions.
- To maintain our own accounts and records;
- To seek your views or comments;
- To process a job application;
- To administer LADTlors' interests
- To provide a reference.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal data.

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we have entered into with you.
- Where we need to comply with a legal obligation.

We may also use your personal data in the following situations, which are likely to be rare:

- Where we need to protect your interests (or someone else's interests).
- Where it is needed in the public interest [or for official purposes].

#### **How we use sensitive personal data**

- We may process sensitive personal data relating to staff, LADTlors and role holders including, as appropriate:
  - information about your physical or mental health or condition in order to monitor sick leave and take decisions on your fitness for work;
  - your racial or ethnic origin or religious or similar information in order to monitor compliance with equal opportunities legislation;
  - in order to comply with legal requirements and obligations to third parties.



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- These types of data are described in the GDPR as “Special categories of data” and require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal data.
- We may process special categories of personal data in the following circumstances:
  - In limited circumstances, with your explicit written consent.
  - Where we need to carry out our legal obligations.
  - Where it is needed in the public interest, such as for equal opportunities monitoring or in relation to our pension scheme.
  - Where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards.
- Less commonly, we may process this type of personal data where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else’s interests) and you are not capable of giving your consent, or where you have already made the information public.

**Do we need your consent to process your sensitive personal data?**

- We do not need your consent if we use your sensitive personal data in accordance with our rights and obligations in the field of employment and social security law.
- In limited circumstances, we may approach you for your written consent to allow us to process certain sensitive personal data. If we do so, we will provide you with full details of the personal data that we would like and the reason we need it, so that you can carefully consider whether you wish to consent.
- You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

**Information about criminal convictions**

- We may only use personal data relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with our data protection policy.
- Less commonly, we may use personal data relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else’s interests) and you are not capable of giving your consent, or where you have already made the information public.
- We will only collect personal data about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so.

**What is the legal basis for processing your personal data?**

- Some of our processing is necessary for compliance with a legal obligation.
- We may also process data if it is necessary for the performance of a contract with you, or to take steps to enter into a contract.
- We will also process your data in order to assist you in fulfilling your role in the LADT including administrative support or if processing is necessary for compliance with a legal obligation.

**Sharing your personal data**

Your personal data will only be shared with third parties including other data controllers where it is necessary for the performance of the data controllers’ tasks or where you first give us your prior consent. It is likely that we will need to share your data with:

- Our agents, suppliers and contractors. For example, we may ask a commercial provider to manage our HR/ payroll functions, or to maintain our database software;
- Other persons or organisations operating within local community.
- Other data controllers, such as local authorities, public authorities, central government and agencies such as HMRC and DVLA
- Staff pension providers
- Former and prospective employers
- DBS services suppliers
- Payroll services providers

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**PRIVACY NOTICE for Staff<sup>1</sup> and Role Holders<sup>1</sup>**

- Recruitment Agencies
- Credit reference agencies
- Professional advisors
- Trade unions or employee representatives

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

We will keep some records permanently if we are legally required to do so. We may keep some other records for an extended period of time. For example, it is currently best practice to keep financial records for a minimum period of 8 years to support HMRC audits or provide tax information. We may have legal obligations to retain some data in connection with our statutory obligations as a public authority. LADT is permitted to retain data in order to defend or pursue claims. In some cases the law imposes a time limit for such claims (for example 3 years for personal injury claims or 6 years for contract claims). We will retain some personal data for this purpose as long as we believe it is necessary to be able to defend or pursue a claim. In general, we will endeavour to keep data only for as long as we need it. This means that we will delete it when it is no longer needed.

**Your responsibilities**

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your working relationship with us.

**Your rights in connection with personal data**

You have the following rights with respect to your personal data: -

When exercising any of the rights listed below, in order to process your request, we may need to verify your identity for your security. In such cases we will need you to respond with proof of your identity before you can exercise these rights.

**1. The right to access personal data we hold on you**

At any point you can contact us to request the personal data we hold on you as well as why we have that personal data, who has access to the personal data and where we obtained the personal data from. Once we have received your request we will respond within one month.

There are no fees or charges for the first request but additional requests for the same personal data or requests which are manifestly unfounded or excessive may be subject to an administrative fee.

**2. The right to correct and update the personal data we hold on you**

If the data we hold on you is out of date, incomplete or incorrect, you can inform us and your data will be updated.

**3. The right to have your personal data erased**

If you feel that we should no longer be using your personal data or that we are unlawfully using your personal data, you can request that we erase the personal data we hold.

When we receive your request, we will confirm whether the personal data has been deleted or the reason why it cannot be deleted (for example because we need it for to comply with a legal obligation).

**4. The right to object to processing of your personal data or to restrict it to certain purposes only**

You have the right to request that we stop processing your personal data or ask us to restrict processing. Upon receiving the request, we will contact you and let you know if we are able to comply or if we have a legal obligation to continue to process your data.

**5. The right to data portability**

You have the right to request that we transfer some of your data to another controller. We will comply with your request, where it is feasible to do so, within one month of receiving your request.

**6. The right to withdraw your consent to the processing at any time for any processing of data to which consent was obtained**

You can withdraw your consent easily by telephone, email, or by post (see Contact Details below).

**7. The right to lodge a complaint with the Information Commissioner's Office.**

You can contact the Information Commissioners Office see contact details below

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**Transfer of Data Abroad**

Any personal data transferred to countries or territories outside the European Economic Area ("EEA") will only be placed on systems complying with measures giving equivalent protection of personal rights either through international agreements or contracts approved by the European Union. [Our website is also accessible from overseas so on occasion some personal data (for example in a newsletter) may be accessed from overseas].

**Further processing**

If we wish to use your personal data for a new purpose, not covered by this Privacy Notice, then we will provide you 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 your prior consent to the new processing, if we start to use your personal data for a purpose not mentioned in this notice.

**Changes to this notice**

We keep this Privacy Notice under regular review and we will place any updates on [www.colwall.net](http://www.colwall.net)  
This Notice was last updated in April 2018.

**Contact Details**

Please contact us if you have any questions about this Privacy Notice or the personal data we hold about you or to exercise all relevant rights, queries or complaints at:

The Company Secretary, Studio 3, Old Cottage Hospital Studios, The Homend, Ledbury, Herefordshire, HR8 1ED. Tel: 01531 636304. E-mail: [enquires@ledburyadt.org](mailto:enquires@ledburyadt.org)

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

**Ledbury and Area Development Trust Limited**  
**General Data Protection Regulation**  
**PRIVACY NOTICE for Tenants**

**Introduction**

The processing of personal data is governed by legislation including the General Data Protection Regulation (the "GDPR") and other legislation. "Personal data" is any information about a living individual which allows them to be identified either directly using the data or by combining it with other information which helps to identify a living individual.

This Privacy Notice is provided to you by **LADT** which is the data controller for your data.

**LADT works together with:**

Other data controllers, such as local authorities and public authorities and, where appropriate to the contract you enter into with LADT, shares personal data for references and similar requirements.

**LADT will comply with data protection law. This says that the personal data we hold about you must be:**

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept and destroyed securely including ensuring that appropriate technical and security measures are in place to protect your personal data to protect personal data from loss, misuse, unauthorised access and disclosure.

**What data do we process?**

- Names, titles, and aliases,
- Contact details such as telephone numbers, addresses, and email addresses.
- Financial identifiers such as bank account numbers, payment card numbers, payment/transaction identifiers, policy numbers, and claim numbers.
- Other operational personal data created, obtained, or otherwise processed in the course of carrying out the contract.
- Next of kin and emergency contact information

**We use your personal data for some or all of the following purposes: -**

Please note: We need all the categories of personal data in the list above primarily to allow us to perform our contract with you and to enable us to comply with legal obligations.

- Making a decision about your recruitment or appointment.
- Determining the terms on which you work for us.
- Administering the contract we have entered into with you.
- Management and planning, including accounting and auditing.
- Dealing with legal disputes involving you.
- Complying with health and safety obligations.
- To prevent fraud.
- To maintain our own accounts and records;
- To seek your views or comments;
- To administer LADT's interests
- To provide a reference.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal data.

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

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- Where we need to perform the contract we have entered into with you.
- Where we need to comply with a legal obligation.

We may also use your personal data in the following situations, which are likely to be rare:

- Where we need to protect your interests (or someone else's interests).
- Where it is needed in the public interest or for official purposes.

**What is the legal basis for processing your personal data?**

- Where processing is necessary for compliance with a legal obligation.
- We may also process data if it is necessary for the performance of a contract with you, or to take steps to enter into a contract.

**Sharing your personal data**

Your personal data will only be shared with third parties including other data controllers where it is necessary for the performance of LADT's tasks or where you first give us your prior consent. It is likely that we will need to share your data with:

- Agents, suppliers and contractors.
- Other persons or organisations operating within the local community.
- Professional advisors

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

We will keep some records permanently if we are legally required to do so. We may keep some other records for an extended period of time. For example, it is currently best practice to keep financial records for a minimum period of 8 years to support HMRC audits or provide tax information. We may have legal obligations to retain some data in connection with our statutory obligations as a public authority. LADT is permitted to retain data in order to defend or pursue claims. In some cases the law imposes a time limit for such claims (for example 3 years for personal injury claims or 6 years for contract claims). We will retain some personal data for this purpose as long as we believe it is necessary to be able to defend or pursue a claim. In general, we will endeavour to keep data only for as long as we need it. This means that we will delete it when it is no longer needed.

**Your responsibilities**

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your working relationship with us.

**Your rights in connection with personal data**

You have the following rights with respect to your personal data: -

When exercising any of the rights listed below, in order to process your request, we may need to verify your identity for your security. In such cases we will need you to respond with proof of your identity before you can exercise these rights.

**8. The right to access personal data we hold on you**

At any point you can contact us to request the personal data we hold on you as well as why we have that personal data, who has access to the personal data and where we obtained the personal data from. Once we have received your request we will respond within one month. There are no fees or charges for the first request but additional requests for the same personal data or requests which are manifestly unfounded or excessive may be subject to an administrative fee.

**9. The right to correct and update the personal data we hold on you**

If the data we hold on you is out of date, incomplete or incorrect, you can inform us and your data will be updated.

**10. The right to have your personal data erased**

If you feel that we should no longer be using your personal data or that we are unlawfully using your personal data, you can request that we erase the personal data we hold.

**Ledbury and Area Development Trust Limited**  
**General Data Protection Regulation**  
**PRIVACY NOTICE for Tenants**

When we receive your request, we will confirm whether the personal data has been deleted or the reason why it cannot be deleted (for example because we need it for to comply with a legal obligation).

**11. The right to object to processing of your personal data or to restrict it to certain purposes only**

You have the right to request that we stop processing your personal data or ask us to restrict processing. Upon receiving the request, we will contact you and let you know if we are able to comply or if we have a legal obligation to continue to process your data.

**12. The right to data portability**

You have the right to request that we transfer some of your data to another controller. We will comply with your request, where it is feasible to do so, within one month of receiving your request.

**13. The right to withdraw your consent to the processing at any time for any processing of data to which consent was obtained**

You can withdraw your consent easily by telephone, email, or by post

**14. The right to lodge a complaint with the Information Commissioner's Office.**

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.

**Transfer of Data Abroad**

Any personal data transferred to countries or territories outside the European Economic Area ("EEA") will only be placed on systems complying with measures giving equivalent protection of personal rights either through international agreements or contracts approved by the European Union. [Our website is also accessible from overseas so on occasion some personal data (for example in a newsletter) may be accessed from overseas].

**Further processing**

If we wish to use your personal data for a new purpose, not covered by this Privacy Notice, then we will provide you 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 your prior consent to the new processing, if we start to use your personal data for a purpose not mentioned in this notice.

**Changes to this notice**

We keep this Privacy Notice under regular review and we will place any updates on [www.colwall.net](http://www.colwall.net) This Notice was last updated in May 2018.

**Contact Details**

Please contact us if you have any questions about this Privacy Notice or the personal data we hold about you or to exercise all relevant rights, queries or complaints at:

The Company Secretary, Studio 3, Old Cottage Hospital Studios, The Homend, Ledbury, Herefordshire, HR8 1ED. Tel: 01531 636304. E-mail: [enquires@ledburyadt.org](mailto:enquires@ledburyadt.org)

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