RCT Privacy Policy

This policy applies to personal information we hold about individuals, sole traders and partnerships.

It does not apply to information we hold about companies and other organisations.

It's important to RCT that people can feel confident that your personal information is safe and being looked after. We appreciate the trust you place in RCT and in return we respect our customers' privacy and are committed to protecting your personal information.

Here we'll set out clearly how we collect, use, disclose and manage your personal information.

By becoming involved with RCT as a volunteer, resident, customer you agree to the collection, use, disclosure and management of your personal information as set out in this policy and your terms and conditions of supply. This is in line with the General Data Protection Regulation (GDPR)

We may amend this policy from time to time, so we recommend that you review it every so often to ensure that you're aware of any changes.

How do we collect your personal information?

We may collect certain personal information from you when you;

- become an owner of a property in Rowner that has a deed of covenant and thus enter into a contract with RCT;
  use our services;
- when you register to use our facilities through an online booking system;
- requesting further information, seeking assistance or reporting a problem with your account or our website;
- when you subscribe to receive our alerts and newsletters, participate in our promotions and competitions, and fill in forms and applications.

Why do we need your personal data?

We need to collect and use your personal information to:

- provide you with the services you have requested from us;
  respond to your enquiries and requests for assistance;
- contact us in relation to your account;
- provide you with information on local services or events;
- tell you about changes to our services;
- obtain your feedback about our services and/or websites;
- comply with our legal and contractual obligations;

What personal information do we collect?

When you enter into a contract with us we will collect;

- your name and contact details including your home address,
- contact telephone number and email address
- your bank account or payment details

We may also collect personal information to enable us to;

- verify your identity, including information from your driving licence, passport or other identity document you have provided when undertaking a DBS check
  documentation to close or transfer an account
- If RCT believe that you or a member of your household could benefit from extra care (for example, because of your age, health, disability or other circumstances) and you agree, we may record this in the information we hold about you to offer you additional services or information.
- We may also share this information, only if you agree, with other support organisations such as social services, charities or healthcare organisations.

When we might need to share your information?

In certain circumstances we may share your personal information with third parties, this includes:

our legal representatives or other concerned parties in circumstances where we reasonably believe that disclosing your personal information is necessary to help identify, contact or bring legal action against anyone damaging, injuring, or interfering with our rights or property, users or anyone else who could be harmed by such activities; and where we are otherwise authorised, or required by law to do so.

How long do we keep this information?

We'll only store your personal data for as long as is necessary to fulfil the purposes outlined in this Privacy Policy or for as long as we reasonably consider necessary to establish, exercise or defend our legal rights. Your data will be retained in line with our statutory and regulatory obligations. The criteria we used to determine these retention periods includes:

The statutory retention periods for accounting records, as set by the Companies Act and HM Revenue & Customs (HMRC).

Where our retention periods are not governed by legislation, our retention policy is based on commercial justifications. These include:

- To enable us to provide you with our services
- To allow us to resolve any disputes or complaints

Where is your personal data stored?

RCT outsource our database to Netsuite, Oracle.

How do we safeguard your personal information?

We strive to ensure the security, integrity and privacy of the personal information we collect. We do our very best to ensure the security of personal information held by us to protect your information from unauthorised access, use, modification, destruction or disclosure.

Access to personal information is restricted to authorised employees and our agents who are obliged to respect the confidentiality of any personal information held by us. We regularly review and update our security measures considering current technologies.

Do we use and disclose your personal information for marketing purposes?

When you enter into a contract with us or obtain a service we will always give you the opportunity to tell us if you wish to receive information about our other products and services.

If you have agreed, we may use your personal information to provide you with information about events in the community, or other local services which we believe may be of interest to you. We do not share your information with other companies and business partners or, service providers. We do share the data within our own RCT group so that they can provide you with services on our behalf or help us to provide you with any services that you have requested. If you change your mind at any time and prefer not to hear from us about local events, please let us know by getting in touch with our Customer Care Team on 02392503433 or emailing hello@rownercommunitytrust.org

How can you access or correct your personal information and credit reporting information, or make a privacy or Data Protection complaint?

You have the right to ask for access to, correction of or erasure of personal information that we hold about you. However, we may limit your access if it would disclose personal information about another person, or where it would disclose commercially sensitive information. You also have the right to make a complaint if you believe that we have not complied with privacy laws in relation to your information.
To obtain access, correct your information, request an erasure, make a complaint or enquire about your rights, please contact us in writing using the contact details below. We will acknowledge any complaints in writing as soon as we can and respond to any complaints or enquiries within 30 days. If you are also dissatisfied with our response you can contact the Information Commissioner office.

For personal information enquiries:
Chief Officer
Rowner Community Trust
Nimrod Community Centre
17 Falcon Meadows Way Gosport PO13 8AA

This policy was last updated on: **10 January 2022**