

South Brent Feoffees

Privacy Policy

Why This Policy

At South Brent Feoffees, we take your privacy seriously and we keep our procedures to safeguard your data under constant review. The law on data privacy is laid out in the UK enactment of the then EU General Data Protection Regulations (GDPR) of 2018 which places a greater burden on organisations which gather and hold your personal data, and which more accurately details your rights (see the table below for those rights and how they relate to South Brent Feoffees).

This updated policy will come into force on 1 January 2023.

There are a limited number of discrete reasons under which organisations may collect, retain and process your data. South Brent Feoffees does so to pursue its legitimate interests in support of you, and/or by specific consent (see below). If you are a beneficiary or tenant and we judge that we need your consent and, if you ask us to, we will meet with you individually to explain and obtain that consent.

How We Will Make This Work

At South Brent Feoffees we consider the letter of the GDPR the minimum remit and we will strive always to be better than the minimum standards. Our focus is always on the dignity and independence of our team and the beneficiaries, applicants or tenants they support; the safe custody and management of your private information is at the heart of this objective.

This privacy policy has been approved by our Trustees and the lead Trustee and this and on all issues of data management and protection is Rob Brighthouse. We are not required to appoint a Data Protection Officer, however our 'Lead Trustee' on GDPR will act to safeguard all our interests in this regard. We will review this policy when appropriate and at least once a year.

The Data We Hold

South Brent Feoffees holds data on three groups of people; each has slightly different rationale for retention, use and sharing within South Brent Feoffees management and with outside agencies (where applicable) to ensure we can meet our charitable objectives.

Generally, except as detailed below, we will not share this information with anyone else for any purpose. If we receive a request for your data from any external organisation or individual, we will normally refuse, but if we feel the request has merit we will contact you with the request and invite you to contact them directly if you desire.

For current beneficiaries, applicant or tenants we will gain your consent after explaining to you what we hold and why. For new beneficiaries, applicant or tenants after 1 January 2023 we will ask for this consent in advance when you join us.

Management Staff

This includes the Clerk, and those members of Luscombe Maye's team who work pro bono in support of the Feoffees. Privacy protocols and data procedures for information to which they have access in the course of their work will be laid out and agreed with each of them.

Tenants

We will keep a record of your name, address, contact details (phone and email where appropriate) and rental financial information as well as any other correspondence relating to the tenancy. We will hold your data to pursue our legitimate interests in managing the tenancy. As part of our obligations the management of our properties is assisted by our estate agency management team at (Luscombe Maye) whose own privacy policy is at <https://www.luscombemaye.com/privacy> and by our auditors (Morgan Accountants Ltd) whose own privacy policy is at <https://www.morganaccountants.com/> while the management of our investments is with Brewin Dolphin whose privacy policy is at <https://www.brewin.co.uk/privacy-notice>

Outside of this, we will not share this information with any other person or organisation, except directly with HMRC if required to do so by them.

This data is kept securely by the South Brent Feoffees as password-protected computer files and for some purposes as hard copy in the office. The data will be also available to members of the appropriate Committee and Trustees to the minimum level required in pursuit of their duties.

Applicants and Beneficiaries

We will keep a record of your name, address, contact details (phone and email where appropriate) as well as records of your personal circumstances necessary for us to give you the best support we can. We hold this data to pursue our legitimate interests in supporting you. For some beneficiaries or applicants in addition this might include some medical history and current health data. Given that health data is a special category under GDPR we will need explicit consent to hold, process and where necessary share your data as below.

We will share your data only when necessary and with legitimate local health care and support organisations to best support you.

This data is kept securely by the South Brent Feoffees Office team as password-protected computer files. Where hard copies are made for temporary use (e.g. meetings with other legitimate bodies) they will be securely shredded on completion. The data will be available to members of the appropriate Committee and Trustees to the minimum level required in pursuit of their duties.

Website Cookies: South Brent Feoffees does not use cookies on its website; we retain no record of your visits. You should be aware, however, that your web browser or search engine may track your visit to our website and hold data relating to your visit over which we have no control. We advise you to become knowledgeable about the behaviour of the systems you use to access the web and use your privacy controls to best reflect your wishes.

Your Rights Under the GDPR

As a not-for-profit organisation we will remain unregistered with the Information Commissioner's Office, but we will remain compliant with the General Data Processing Regulation (GDPR) which came into force in May 2018. As such you, as the "data subject" within the regulations have eight rights, the first six of which have applicability to South Brent Feoffees.

It should be noted that, in common with most legislation, there is considerable detail in the rights and if you plan to exercise one of them (particularly those marked *) it would be good to have a look at the full details on the Information Commissioner’s Office website

<https://ico.org.uk>

In all circumstances we will do our best to assist you in exercising your rights or suggesting an independent adviser in the unlikely event of any conflict.

These six rights apply to South Brent Feoffees:

Your Rights	How you exercise them with South Brent Feoffees
The right to be informed	Through this privacy policy, here and on our website.
The right of access	Simply send us an email, phone or write to us to ask what we Hold.
The right to rectification	Having seen what we hold, you can tell us to change it if it is Wrong.
The right to erasure	In certain circumstances* you can ask us to erase the data we hold at any time; your data will also be erased within twelve months after you cease to have a beneficial, or other, connection with South Brent Feoffees for any reason.
The right to object	If for any reason you feel the data we hold is causing you concern (although that is unlikely given that we only hold the above data), you can object* to us, and, if you are still not happy, to the Information Commissioner
The right to restrict processing	We mainly process your data internally for your benefit as a beneficiary or applicant. Tenant’s information may also be seen by our financial advisors and auditors. Their privacy policies are referred to above. You can at any time ask us about this and, if you desire, restrict what we do; we will advise you of any implications of any restrictions you place upon us.*

The rights which don’t specifically apply to South Brent Feoffees:

Rights which don’t apply	Why it doesn’t apply
The right to data portability	We do not have any connections to similar organisations, so data portability is not an issue. Either we continue to hold your data while we work with, and for, you, or we erase it.
Rights in relation to automated decision making and profiling	We do not conduct these activities

*Full details of GDPR rights are available at www.ico.org.uk