

# Bell Inn Iden Community Limited (CBS)

## Data Protection Policy

### 1. Status and Definitions

Bell Inn Iden Community Limited ("the CBS") is the **Data Controller** for the purposes of the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Personal data means any information relating to an identifiable individual. This may include names, addresses, email addresses, telephone numbers, financial records, images and written correspondence. Data may be stored electronically or in paper form.

Data protection concerns how the CBS collects, stores, uses, shares and disposes of personal data in compliance with applicable law.

### 2. Responsibility

Overall responsibility for data protection rests with the **Management Board** of the CBS.

The Board will designate a named individual responsible for handling data protection queries and coordinating responses to subject access requests and data breaches.

### 3. Lawful Basis for Processing

The CBS processes personal data only where a lawful basis applies under UK GDPR. These include:

1. **Contractual necessity** – where processing is necessary to fulfil a contract with an individual (e.g. issuing community shares).
2. **Legal obligation** – where the CBS must comply with statutory duties (e.g. maintaining a register of members, financial records).
3. **Legitimate interests** – where processing is necessary for the legitimate interests of the CBS, provided these are not overridden by individuals' rights.
4. **Consent** – where individuals have freely given clear consent (e.g. joining a mailing list).
5. **Vital interests or public task** – where applicable under law.

The lawful basis relied upon will depend on the category of data:

- **Shareholders (members):** Contractual necessity and legal obligation.
- **Donors:** Legitimate interests (and consent where applicable).
- **Mailing list subscribers:** Consent.
- **Committee members:** Legal obligation and legitimate interests.

## 4. General Principles

The CBS will:

1. Collect and use only the minimum personal data necessary for clear purposes.
2. Ensure data is processed lawfully, fairly and transparently.
3. Keep data accurate and up to date.
4. Retain data only for as long as necessary.
5. Protect data using appropriate technical and organisational measures.
6. Maintain records of processing activities where required.

## 5. Data Retention

Personal data will be retained as follows:

- Shareholder (member) records: for the duration of membership and for a statutory retention period thereafter.
- Financial and donation records: minimum 6 years in line with HMRC requirements.
- Mailing list data: until consent is withdrawn.
- Committee records: retained as necessary to meet governance and legal requirements.

Data will be securely deleted or destroyed once retention periods expire, unless continued retention is legally required.

## 6. Individual Rights

Individuals have the right to:

- Request access to their personal data.
- Request correction of inaccurate data.

- Request erasure of data where legally permissible.
- Request restriction of processing.
- Object to processing based on legitimate interests.
- Lodge a complaint with the Information Commissioner's Office (ICO).

Requests should be made to: admin@bellatiden.com

The CBS will respond within statutory time limits.

**Note:** Certain data (e.g. statutory membership registers or financial records) cannot be erased where legal obligations apply.

## 7. Data Security

Personal data will be stored securely:

- Electronic records will be password protected and access restricted.
- Cloud-based systems will be reputable providers offering appropriate safeguards under UK GDPR.
- Paper records (if held) will be securely stored and access controlled.

Access to personal data will be limited to those who require it for CBS purposes.

## 8. Third-Party Processors

The CBS may share personal data with trusted third-party service providers where necessary, including:

- Email communication providers (e.g. Mailchimp)
- Accountants and professional advisers
- Cloud storage providers

Appropriate safeguards will be in place to ensure compliance with UK GDPR, including where data is transferred outside the UK.

## 9. Data Breaches

The CBS will investigate and report personal data breaches.

Where a breach poses a risk to individuals' rights and freedoms:

- Affected individuals will be informed where legally necessary.

- The ICO will be notified within 72 hours where required.

The Board will review any breach and take steps to prevent recurrence.

## **10. Mailing List**

The CBS maintains a mailing list for communications and fundraising.

- Individuals will be informed how their data will be used.
- Consent will be obtained where required.
- Every communication will provide a clear unsubscribe option.

## **11. Shareholder Communications**

The CBS maintains a statutory register of members.

Shareholders will receive a privacy notice explaining:

- Why their data is held.
- How it is used.
- How long it is retained.
- Their rights under UK GDPR.

## **12. Review**

This policy will be reviewed every two years or sooner if required by changes in legislation or operational practice.

Date: 25<sup>th</sup> February 2026