



TC Data Protection Policy

TC is a not-for-profit organisation constituted as a company limited by Guarantee, managed by a board of trustees elected annually by the *registered members*. In addition to the registered membership there are many *subscribers* who have requested and regularly receive TC information. Many subscribers also participate in TC activities and events, though they are not formally registered as members.

This TC Data Protection Policy covers all: registered members and subscribers. For the purpose of this policy the term ‘member(s)’ shall include ‘subscriber(s)’ except where the context indicates otherwise.

Information (data) retained

TC holds information relating to individual members for the purpose of administration and communicating with them TC about TC events and activities.

Type 1 data. The following basic information is held for all to enable communications about TC and related activities and events:

- Name;
- Address (postal and/or email);
- Telephone number(s) (optional);
- *Registered membership* status (Y/N).

Type 2 data. For some members additional data is required due to the nature of the activities with which they are involved and/or their particular circumstances. For members active in TC gardens or special events data information relating to:

- Volunteer Enrolment forms including health and physical disabilities;
- Special dietary requirements;
- Information concerning allergies, etc, relating to planned activities;
- Emergency contact information;
- Special training e.g. First Aid;
- DBS clearance.

Format and Storage of Data

The basic, Type 1 Data, covering all members will be held on the MailChimp database system used to circulate TC information using email.

Additional, Type 2 Data, will be held in paper format and held in locked containers at the location where the individuals are actively engaged and thus the information may be needed. Access the data (keys, etc) will be made available as needed to persons supervising the site activity, e.g. gardening or other external events.

Access to Data

Access to and retention of all data will be managed by the TC Data Protection Controller (TCDPC) who will be appointed by the TC Trustees.

Individual members may request access to all data held relating to themselves by request to the TCDPC and may require that the data be modified or removed.

Data no longer required, e.g. if a member resigns, will be deleted unless there is a clear need to retain it. It is the responsibility of the TCDPC to decide if data needs to be retained and if so to maintain it securely for the time it is required.

The TCDPC may authorise members, sub-contractors and others to access and use data held by TC for reasonable TC purposes. The TCDPC must ensure that anyone so authorised is familiar with the requirements of this policy and does not abuse the data.

Data Distribution

Members' data held by TC will not be transferred to any other person or organisation unless formally authorised by the individual(s) concerned.