

Version 2 effective from 1<sup>st</sup> March 2024

## **Membership Privacy Notice**

In line with the requirements of Data Protection legislation (the UK GDPR and the Data Protection Act 2018) this privacy notice confirms the data we hold about you as a BHA shareholding Member, the reasons and lawful basis for doing so and the arrangements that are in place to ensure its security.

Broadland Housing Association is the Data Controller for the purposes of implementing your shareholding membership. We take your privacy seriously, and have safeguards in place to ensure that your data is kept securely, accessed only by those employees who need to process it, and kept for no longer than necessary.

To manage your shareholding membership, we retain the following data about you:

- Your name
- Your organisation name (where relevant)
- Your contact details, which may include address, phone number and email address
- Your date of birth
- Your share number
- Date your shareholding membership commenced

All the above details are processed under the lawful basis of Legal Obligation (ref. GDPR article 6), as they are required to allow us to manage the shareholding membership.

You have rights as a data subject under the UK GDPR and the Data Protection Act 2018, as shown below:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure (though we would need to retain limited details to comply with the Companies Act 2006)
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling (NB this is not used in relation to your arrangement).

We do not process any special category (sensitive) information about you. We will not

sell your information or, or use it for purposes other than those described above. We will not transfer it out of the UK. However, we may be required to make the register of members available for inspection to certain regulatory bodies, to authorised members, or to anyone else who meets the request criteria set out in the legislation. A fee may be payable.

We will retain your data only so long as it is necessary for us to manage the shareholding membership and in accordance with our retention schedule.

You have the right to make a complaint if you feel that Broadland is using your personal identifiable information unlawfully and/or holding inaccurate, inadequate or irrelevant personal identifiable information which, if used, may have a detrimental impact on you and/or has an impact on your rights and freedoms. You can also make a complaint to the data protection supervisory authority (in the UK, this is the Information Commissioner's Office, at <a href="https://ico.org.uk">https://ico.org.uk</a>). We would ask you to make contact with us in the first instance so we can try to work with you to resolve the issue.

This privacy notice is available on the Broadland Housing website and any future amendments to the notice will be published and made available via the website.

Should you wish to know more about these rights, or you have any queries relating to anything in this privacy notice, please feel free to contact our Data Protection Officer at <u>data@broadlandgroup.org</u>.

Yours sincerely,

Savel Wyatt

Sarah Wyatt Head of Governance Broadland Housing Association