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## **Data Protection Policy for Good to Grow**

### **1. Policy Statement**

Good to Grow uses and store personal information about its members, stakeholders and colleagues. Data protection is a high priority for us. It is important that this information is handled lawfully and appropriately in line with the requirements of the General Data Protection Regulation 2016 ("GDPR").

Good to Grow can be contacted about data protection using [info@goodtogrow.coop](mailto:info@goodtogrow.coop)

Good to Grow Co-operative Limited  
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This Policy applies to all digital activities of Good to Grow. This includes the usage of [www.goodtogrow.coop](http://www.goodtogrow.coop)

### **2. About This Policy**

This policy, and any other documents referred to in it, sets out the basis on which we will process any personal data we collect or process.

The Good to Grow Board is responsible for ensuring compliance with the relevant data protection legislation and with this policy. The Board is also responsible to ensure that anyone employed or volunteering within Good To Grow is aware of and understand the policy.

Any questions about the operation of this policy or any concerns that the policy has not been followed should be referred in the first instance to **The Secretary, Good To Grow.**

### 3. What is Personal Data?

**Personal data** means data (whether stored electronically or paper based) relating to a living individual who can be identified directly or indirectly from that data (or from that data and other information in our possession).

**Processing** is any activity that involves use of personal data. It includes obtaining, recording or holding the data, organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transferring personal data to third parties.

**Sensitive personal data** includes personal data about a person's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic, biometric, physical or mental health condition, sexual orientation or sexual life. It can also include data about criminal offences or convictions. Sensitive personal data can only be processed under strict conditions, including with the consent of the individual. **We store no sensitive data.**

### 4. Data Protection Principles

Anyone processing personal data at Good to Grow must ensure that data is:

- Processed fairly, lawfully and in a transparent manner.
- Collected for specified, explicit and legitimate purposes and any further processing is completed for a compatible purpose.
- Adequate, relevant and limited to what is necessary for the intended purposes.
- Accurate, and where necessary, kept up to date.
- Kept in a form which permits identification for no longer than necessary for the intended purposes.
- Processed in line with the individual's rights and in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

This Policy will be included in any Induction pack for Directors and any volunteers as well any employee.

## 5. Fair and Lawful Processing

The legal requirements are not intended to prevent the processing of personal data, but to ensure that it is done fairly and without adversely affecting the rights of the individual.

In accordance with GDPR, we will only process personal data where it is required for a lawful purpose.

The lawful purposes most relevant to Good to Grow include:

- **Consent** : when consent is expressed via a clear affirmative actions such as “opt-in” actions for receiving our e-news.
- **Necessity for compliance with a legal obligation**: when the Secretary or any authorised officer collects and store information which must be held on registers as required by the Co-operative and Community Benefit Societies Act (NI) 1969 .
- **Necessity for the legitimate interest of the business**: when the Board or any authorised officer needs to contact members to inform them about AGMs, General Meetings and relevant business decision.
- **Necessity for performing a contract with the individual** : when we process personal data of an employee and/or external consultants. The data collected is collected and used for entering and performing the employment/consultancy contract.

We will notify those purposes to the individual when we first collect the data or as soon as possible thereafter but within 30 days.

When sensitive personal data is being processed, additional conditions must be met. We do not hold sensitive data.

## 6. Processing for Limited Purposes

In the course of our business, we may collect and process personal data on behalf of other co-operatives or business partners. This may include data we receive directly from an individual for example, by completing forms or by corresponding with us by mail, phone, email or otherwise and data we receive from other sources including, business partners and/or sub-contractors.

We will only process personal data for the specific purposes set out in specific agreements with other organisations or for any other purposes specifically permitted by law.

We will notify those purposes to the data subject when we first collect the data or as soon as possible thereafter but within 30 days.

## **7. Notifying Individuals**

Good to Grow will inform individuals about this Data Protection Policy through its website and via Privacy notices when necessary. Privacy notices will contain the following information:

- The identity and contact details of Good to Grow and the officer responsible for data protection.
- The purpose and legal ground for processing data
- The individual's rights to access to, erasure or restriction of their personal data
- The right to complain to the Information Commissioner's Office

If we receive personal data about an individual from other sources, we will provide them with this information as soon as possible but at the latest within 30 days.

We will also inform individuals whose personal data we process that we are the data controller or data processor with regard to that data.

## **8. Adequate, Relevant and Non-excessive Processing**

We will only collect personal data to the extent that it is required for the specific purpose notified to the data subject.

## **9. Accurate Data**

We will ensure that personal data we hold is accurate and kept up to date. We will check the accuracy of any personal data at the point of collection and at regular intervals afterwards. We will take all reasonable steps to destroy or amend inaccurate or out-of-date data.

## **10. Timely Processing**

We will store data for as long as the information can be of use to us, unless you specifically contact us otherwise. We retain information for as long as is required for the data's intended purpose, and normally, due to data archiving and disaster recovery policies, for at least seven years as required to perform full data recovery in the event of a full disaster.

We will not keep personal data longer than is necessary for the purpose or purposes for which it was collected. We will take all reasonable steps to destroy, or erase from our systems, all data which is no longer required.

## **11. Processing in line with Data Subject's Rights**

We will process all personal data in line with individual' rights, in particular at any time you can request (by emailing [info@goodtogrow.coop](mailto:info@goodtogrow.coop))

- to see what data Good to Grow holds about you

- to change the data that Good to Grow has about you
- for Good to Grow to delete the data we hold about you

## 12. Data Security

We will take appropriate security measures against unlawful or unauthorised processing of personal data, and against the accidental or unlawful destruction, damage, loss, alteration, unauthorised disclosure of or access to personal data transmitted, stored or otherwise processed.

We will put in place procedures and technologies to maintain the security of all personal data from the point of the determination of the means for processing and point of data collection to the point of destruction.

Members registers and any databases of personal data will all be encrypted on main PC. Copies of encrypted files will be stored on an external drive for recovery purposes only. The external drive will be kept in a locked safe box.

When information about members needs to be communicated and exchanged among authorised colleagues within Good to Grow in the course of their work then paper copies and emails about such members will contain only necessary information and individuals will not be referred to by names but by coded numbers.

When such exchanges are between Good to Grow (as the data processor) and Third Parties (as the data controller) an appropriate means of communication should be chosen and a protocol agreed.

Good to Grow personal data will only be transferred to a data processor/third party who agrees to comply with those procedures and policies, or if the data processor/third party puts in place adequate measures himself.

We will maintain data security by protecting the confidentiality, integrity and availability of the personal data, defined as follows:

**Confidentiality** means that only people who are authorised to use the data can access it.

1. **Integrity** means that personal data should be accurate and suitable for the purpose for which it is processed.
2. **Availability** means that authorised users should be able to access the data if they need it for authorised purposes. Personal data should therefore be stored on Good to Grow main PC.

**Security procedures include:**

- **Entry controls.** Data will be processed in a controlled area not accessible to the public.
- **Secure lockable desks and cupboards.** Desks holding confidential information or safe-box are kept locked. (Personal information is always considered confidential)
- **Pseudonymisation and encryption of data.** Members registers are encrypted and/or have passwords.
- **Methods of disposal.** Paper documents are shredded. Digital storage devices are physically destroyed when they are no longer required.
- Staff must ensure that individual monitors do not show confidential information when left unattended.

#### **14. Disclosure and Sharing of Personal Data**

Good to Grow does not sell, rent, loan, trade or lease the information to any third party for the purposes of marketing or selling goods and services.

Good to Grow does not share personal data with any other organisations.

#### **15. Subject Access Requests**

Individuals must make a formal request for information we hold about them. Employees who receive a request should forward it to [info@goodtogrow.coop](mailto:info@goodtogrow.coop) immediately.

When receiving telephone enquiries, we will only disclose personal data we hold on our systems if the following conditions are met:

- We will check the caller's identity to make sure that information is only given to a person who is entitled to it.
- We will suggest that the caller put their request in writing if we are not sure about the caller's identity and where their identity cannot be checked.

Where a request is made electronically, data will be provided electronically where possible.

#### **16. How we collect and store data**

We maintain a database where we store contact details and information about organisations and individuals other than members.

We also maintain a register of members and directors as required by law.

Our website has the functionality for users to join Good to Grow. We do not make the name and any relevant data of our members public. The only information we publicly share about our

membership is the number of members we have on our Annual Return to the Financial Conduct Authority. No individual data is shared.

When we profile Directors on our website, this is done after receiving prior approval and consent from the individual in question for the content and the photographs we use.

The information collected through the website is not shared but is accessible by our Web Developers **PLEASE DELETE OR ADD NAME IF NECESSARY** not appointed at present at times when they are developing functionality for us.

The servers hosting these websites automatically collect logs that may record statistical information such as visitors' IP addresses, type of operating systems, time of visit, web pages requested etc, and identify categories of visitors by items such as domains and browser types. These usage statistics are used to improve our websites and maintain site security. The information in these logs is never used by us in a personally identifiable way, although they may be able to identify or show the individual ISP or company accessing the site. Your ISP or organisation may make such data available that would allow personal identification, but we do not use this data.

We collect data through surveys, such as Monkey Survey **and similar** - do not know of any others. This data is primarily about co-operatives but often include personal contact details. We do not share personal details but we store the information to communicate with individuals/organisations about the survey and future surveys. We may present the information collated about organisations/co-operatives at conference, seminar and other public events in an anonymised matter without disclosing personal details.

We organise many events throughout the year and we collect data on who is attending. We explicitly ask people if we can store or share their data with delegates who attended an event. Permission is given upon arrival at the event and we action such permissions after the event. We use Eventbrite **and similar as they become available** **PLEASE INSERT PLATFORMS YOU USE** – I do not know of any others to manage many of our events. People who submit their data through Eventbrite to attend an event agree for Eventbrite to store their data as per Eventbrite's Terms and Conditions.

We upload the contact details of people who agree for us to send them a newsletter to **PLEASE INSERT PLATFORMS YOU USE** – initially we will be using an app on the website so we can use this platform to send newsletters. If people receive a newsletter and change their mind about receiving them, all newsletters will have an unsubscribe link and people can request to not receive them anymore by emailing [info@goodtogrow.coop](mailto:info@goodtogrow.coop)

### 17. Changes to this Policy

We reserve the right to change this policy at any time. Where appropriate, we will notify changes by mail or email.

Title	Data Protection, including GDPR, Policy		
Author	Good To Grow Directors		
Date	21 <sup>st</sup> June 2021		
Approval	Name: ???	Date:	
Version	1.0	Supersedes	
Policy to be read in conjunction with:	Membership Policy Refund Policy Complaints Policy		