

# South Brent Community Energy Society

## Privacy Notice for Directors – June 2021

South Brent Community Energy Society Limited (“the Society”) is a data controller and is committed to protecting your data and working in accordance with all relevant data protection legislation. Your data is used for communicating with you regarding the activities of the Society. This Privacy Notice explains how the Society processes and uses the personal data we collect about you.

### **What data do we hold?**

The society holds data relating to you that you provided on application to join the society or on receipt of a transfer of shares or on becoming a director.

Our records include:

- Contact Details – your name, address, email address and telephone number(s). We update these whenever you tell us they have changed.
- Your preferred method of contact – post or e-mail.
- The dates you joined or left the Society, shareholding and/or other interest in the Society.
- Your bank details so that the Society can pay interest by BACS, if you have chosen to be paid this way.

As a director we also collect the following “Additional Data”:

- The date you became a director and the date you ceased to be a director.
- Year of birth.
- Occupation.
- Other directorships.

We are required to ensure that data we hold about you is as accurate as possible, therefore we may update your details based on reliable publicly available sources. For example we may update your address or telephone number from the BT telephone directory if we have been unable to contact you.

We will retain your data for as long as you remain a member of the Society.

### **How do we use your data?**

The Society uses your data to send you notices and details of General Meetings of the Society. It may also use your data to send you newsletters.

Communications may be sent to you by post, telephone, email, text or other electronic means (for example through social media) depending on the communication preferences you have shared with us.

Your Additional Data is required to complete the FCA's annual return and may also be needed to maintain the Society's bank and savings accounts.

As a director, your name will appear on the Society's website, in published minutes of the Society and in the Society's annual Financial Statements.

### **How will we share your data?**

We will not share your data with third parties unless there is a legal obligation to do so. For example, the society is legally obliged to provide HMRC with details of interest payments to members.

The Society does NOT sell data to third parties or allow third parties to sell on data where data is shared with

them.

### **How do we protect your data?**

Your data is held securely on the Society's company register. The register is accessible to a limited number of Society directors. All directors who access the register have completed the Society's data protection training.

The Society ensures that appropriate data sharing agreements are in place prior to sharing your personal data with any partners.

### **Your rights and preferences**

You have the right to ask to see, correct or delete the data we hold about you and to request the electronic transfer of your data to a third party.

If you no longer want to receive newsletters by post, telephone, text, email or other electronic means, please write to the Company Secretary, South Brent Community Energy Society, School House, Totnes Road, South Brent, Devon TQ10 9BP.

When contacting us please specify if you wish to unsubscribe from all communications or from specific communication types or channels.

We cannot delete all your data if you remain a member of the Society. If you leave the Society we may need to retain some records for statutory purposes.

You also have the right to lodge a complaint with the Information Commissioner's Office at [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns).

### **Legal Basis**

The legal basis for the Society to hold and process your personal data for the purposes described above is that it is necessary to meet its obligations under the Cooperative and Community Benefit Societies Act (2014). Sharing your data with HMRC is required under Section 887 of the Income Tax Act 2007. Bank account data is used to pay interest, the legal ground being that this is necessary for performing a contract with you. Consent for your choice to receive communications by post or e-mail was given on application to join the Society.

### **Review**

This Privacy Notice will be kept under review. Any changes will be updated on our website and communicated to you as appropriate. This Privacy Notice was last reviewed by the Board of Directors on 8 June 2021.