

Letchworth Garden Shed CIC

Privacy Policy

Our contact details

Name: [Letchworth Garden Shed CIC](#) (also, 'Letchworth Garden Shed' and the 'LGS')

Address: [69 Leys Avenue, Letchworth Garden City, Hertfordshire, SG6 3EF](#)

Phone Number: (pending)

E-mail: letchworthgardenshed@gmail.com

Insert the contact details for your business. You could also include a postal address, any main email addresses, phone numbers or web addresses.

Include the date you completed the privacy notice.

The type of personal information we collect

We currently collect and process the following information:

- Personal identifiers, contacts and characteristics (for example, name and contact details) [Your name, home address, email address and phone number.](#)
- [\[Add to this list as appropriate\]](#) [When you became a member, what you've borrowed, and when you borrowed it, and if any late fees are incurred, we keep a track of how many there have been and when they happened.](#)

Tell people about the type of personal information you collect. Personal information is any information that can be used to identify a living person. For example members' email addresses, customer financial information, employee data or website user stats. You can find more about [what constitutes personal information](#) on our website.

How we get the personal information and why we have it

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- **[Add the reasons you collected personal information]** To set up your membership, including free memberships that might be provided for tenants of certain housing associations. Another reason we use your personal information is to keep a track of the stock - who had it last, who has it now, who wants to borrow it next. We also use it to get in touch if there's anything about what you've borrowed, or your booking for an item, that you should know about - if it's overdue, if you're about to incur a late fee, if the previous borrower hasn't returned the item you've booked yet, and so on.

[If applicable] We also receive personal information indirectly, from the following sources in the following scenarios:

- **[Add the source of any data collected indirectly and why you collected the personal information]** We have set up arrangements with local housing associations that in some cases, provide free memberships for their tenants. The housing associations provide us with lists of their domestic properties, which we check against the proof of address tenants bring in when they join up, to activate the free membership.
- The local Citizens Advice refer the names and people to us that they feel would benefit from a free membership. We check these names against the I.D. the people use when they come in to activate the free membership.

Outside of can't think of anything here, Jeremy! Would the interaction we have with people's banks count as indirect data - for example, if a transaction is declined by our payment system?

We use the information that you have given us in order to **[list how you use the personal information]**. *Not sure if I should just copy in the para from the top of the page - should I repeat the above, or is this asking for something else?*

We may share this information with **[enter organisations or individuals]**.

I think under safeguarding regulations, we can share it with the council's safeguarding team, or the police, so

If we have genuine concerns about an adult or a child being neglected or abused, or that an adult can't look after themselves, we have a duty to notify the Hertfordshire County Council's safeguarding team.

If we feel that anyone is in immediate danger, we have a duty of care to call the police.

In these cases, but these cases only, we may help the authorities with their inquiries by supplying the identifying details we hold, such as the name, address and contact details of the person or people involved.

I don't know if examples make it better or worse - let me know what you think.

For example, if a member comes in to pick up an item with an adult who doesn't speak English, is emaciated, dishevelled or disorientated, and appears to be frightened of that member, then we may go to the HCC's Safeguarding Team with concerns that this person is being held in modern day slavery. If anyone assaults a person in our store, we will contact the police. In both cases, we will provide the details we have for the people involved to help with the investigations.

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are: **[delete as appropriate]**

(a) Your consent. You are able to remove your consent at any time. You can do this by contacting [\[contact details\]](#) letchworthgardenshed@gmail.com

(b) We have a contractual obligation. *Do we?*

(c) We have a legal obligation. *Mmm..not sure.*

(d) We have a vital interest. *'Vital interest' is only for matters of life and death, according to google.*

(e) We need it to perform a public task. *Is what we do a public task? It feels like only a and f pertain here.*

(f) We have a legitimate interest. *This makes the most sense.*

Tell people how you collect their personal information and where you collect the information from.

Tell people the reasons why you need to collect or hold their information. Include your lawful basis for doing this in this section (visit our [lawful basis guidance and interactive tool](#) to help you work this out).

Tell people about any instances in which you pass personal information to a third party and outline your reasons for this.

If you are relying on consent to process individual's information, then you should also tell people about their right to withdraw consent and how they can do this.

How we store your personal information

Your information is securely stored.

We keep [type of personal information] your name, home and email address, telephone number and borrowing history for [time period] a year without a transaction by you. We will then dispose your information by

Tell people how or where you keep their personal information, how long you intend to keep it for and then how you intend to securely destroy or dispose of it. You need to do this for every type of information you hold.

[explain how you will delete their data]. *Not sure about this either - just by deleting it?*

Your data protection rights

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal information.

Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing - You have the the right to object to the processing of your personal information in certain circumstances.

Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at [\[insert email address, phone number and or postal address\]](#) if you wish to make a request.

Tell people about their data protection rights. Their rights will differ depending on your lawful basis for processing, so once you know this then you can select the relevant sections from the text in the template below to include in your Privacy Notice. The [lawful basis](#) page of our Guide to the GDPR has a useful table that shows the varying rights that apply depending on the lawful basis.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at [\[Insert your organisation's contact details for data protection queries\]](#).

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

Tell people how to make a complaint to you here. Include the ICO's address.