

DATA PRIVACY POLICY

BACKGROUND:

This Policy sets out the obligations of the Woodland Grove (Market Rasen) Management Company Limited ("the Company") regarding data protection and the rights of shareholders in respect of their personal data under the General Data Protection Regulation (GDPR).

1. Legal Basis for processing personal data

- 1.1 The lawful basis for processing shareholders' personal data is that the Company would be unable to perform its legal obligations under the Deed of Covenant held by each shareholder unless it is able to process such data.

2. Information About Us

- 2.1 We are UK registered company No. 5093976
- 2.2 Our website address is: <http://www.wgmc.org.uk>
- 2.3 Personal data will be held and processed in accordance with this policy by Mr. John Edser of 7 Fern Drive, Market Rasen, LN8 3NU.
- 2.4 As a not-for-profit organisation we are exempt from registration with the Information Commissioner's Office.

3. What Does This Policy Cover?

- 3.1 This Privacy Policy applies to personal data that has been supplied in order for the Company to comply with its legal obligations under the Deed of Covenant between us and each shareholder.

4. Your Rights

- 4.1 As a shareholder, you have the following rights under the GDPR, which this Policy and our use of personal data have been designed to uphold:
 - 4.1.1 The right to be informed about our collection and use of personal data;
 - 4.1.2 The right of access to the personal data we hold about you;
 - 4.1.3 The right to rectification if any personal data we hold about you is inaccurate or incomplete;
 - 4.1.4 The right to be forgotten – i.e. the right to ask us to delete any personal data we hold about you after you cease to be a shareholder;
 - 4.1.5 The right to restrict the processing of your personal data to tasks directly related to Deed of Covenant obligations;
 - 4.1.6 The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);
 - 4.1.7 The right to object to us using your personal data for particular purposes; and
 - 4.1.8 Rights with respect to automated decision making and profiling.
- 4.2 If you have any cause for complaint about our use of your personal data, please contact us using the details provided in section 9 and we will do our best to solve the problem for you. If we are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office.
- 4.3 For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau.

5. What Data Do We Collect?

- 5.1 We collect your personal data from our solicitor prior to share transfer and from you after share transfer. Under circumstances where we have difficulty in communicating with you we may obtain information from a third party. We do not use any other means of data collection.

6. How Do We Use Your Data?

- 6.1 Your data will be processed and stored securely, for no longer than is necessary for us to perform our legal obligations to you;
- 6.2 Your data will be used to enable us to process the transfer of the Deed of Covenant and Company share to you, to administer the estate maintenance charges and to communicate with you over estate

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matters.

- 6.3 Your data may also be supplied to our solicitors in connection with Deed of Covenant related matters.
- 6.4 Emails received from you will be retained for up to two years but will be deleted immediately after use if you request this preference;
- 6.5 You have the right to withdraw your consent to us using your email address and telephone number but cannot withdraw the right to the use of the personal data required to enable us to perform our legal obligations.

7. How and Where Do We Store Your Data?

- 7.1 We keep your personal data for as long as you remain a shareholder in order to use it as described above in section 6.
- 7.2 One year after you are no longer a shareholder personal data such as email address and telephone numbers will be deleted from our database. However, Company accounts and statutory records will be retained for a minimum of seven years.
- 7.3 Data stored in hard copy form and on computers used for processing will be located in secure UK workplaces designed to prevent access by unauthorised personnel.
- 7.4 Computers will be password protected.
- 7.5 Computer data files and backup files may be located in the cloud in encrypted form on computers residing outside of the UK.

8. How Can You Access Your Data?

- 8.1 You have the right to ask for a copy of any of your personal data held by us. Under the GDPR, no fee is payable and we will provide any and all information in response to your request free of charge.

9. Contacting Us

If you have any questions about this Privacy Policy or wish to exercise any of your rights under GDPR, please contact us using the contact details in section 2.3 above.

10. Changes to Our Privacy Policy

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on our website and recommend therefore that you access this site from time to time to ensure that you agree to any changes.

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