



Privacy Policy

Policy Version

- Policy Prepared by Chris Jenkins, Estate Manager & Company Secretary
- Approved by JVL Management Committee 27-Apr-2018
- Policy became operational on 01-May-2018
- Next Review Date 01-Jan-2021
- Version 1.2

Jordans Village Ltd (JVL) is a Society registered in England under the Co-Operative & Community Benefit Societies Act 2014 (registration number 7533R), and we are regulated by the Financial Conduct Authority.

OVERVIEW

We are committed to maintaining the trust and confidence of our members, residents, and tenants, and visitors to our office, village, and web site. In particular, we want you to know that Jordans Village Ltd does not sell, rent or trade email lists with other companies and businesses for marketing purposes. We pledge to handle your data fairly and legally at all times.

Our Privacy Policy applies whether you visit our office, hall, use your mobile device or go on line to visit our website. Our Privacy Policy provides detailed information on:

- how we use your data;
- what personal data we collect;
- when and why we collect personal data;
- the limited conditions under which we may disclose it to others;
- how we ensure your privacy is maintained; and
- your legal rights relating to your personal data.

HOW WE USE YOUR DATA

General

JVL (and trusted partners acting on our behalf) uses your personal data:

- a) to communicate with you in the administration of our business and the village;
- b) to make a tailored website available to you;
- c) to verify your identity;
- d) to comply with our legal obligations;
- e) with your agreement, to contact you electronically about news which we think may interest you;
- f) where we have a legal right or duty to use or disclose your information (for example in relation to comply with legislation, or to assist with an investigation by a public authority or in a legal dispute).

Sharing data with third parties

Our service providers and suppliers

In order to run our business, we may need to share your personal data with some of our service partners. These include accounting, book-keeping, maintenance, legal, and IT service providers.

JVL only allows its service providers to handle your personal data when we have confirmed that they apply appropriate data protection and security controls. We also impose contractual obligations on service providers relating to data protection and security, which means that they can only use your data to provide services to JVL and to you, and for no other purposes.

Other third parties

Aside from our service providers, JVL will not disclose your personal data to any third party, except as set out below. We will never sell or rent our customer data to other organisations for marketing purposes.

How long do we keep your data?

JVL maintains an historic archive, and retains data and information ad infinitum. This gives us exemption from requests to erase data.

WHAT PERSONAL DATA DO WE COLLECT?

JVL may collect the following information about you:

- a) Shareholders: Names, Addresses, Home & Mobile Telephone Numbers, Email Addresses, Historic Correspondence (Physical & Electronic)
- b) Loan Stock Holders: Names, Addresses, Home & Mobile Telephone Numbers, Email Addresses, Bank Details, Historic Correspondence (Physical & Electronic)
- c) Tenants: Names, Addresses, Dates of Birth, Names of Children, Home & Mobile Telephone Numbers, Email Addresses, Historic Correspondence (Physical & Electronic)
- d) Waiting List: Names, Addresses, Dates of Birth, Names of Children, Children's Dates of Birth, Home & Mobile Telephone Numbers, Email Addresses, Historic Correspondence (Physical & Electronic)
- e) Other Residents: Names, Addresses, Home & Mobile Telephone Numbers, Email Addresses, Historic Correspondence (Physical & Electronic)
- f) Contractors & Suppliers: Names, Addresses, Work & Mobile Telephone Numbers, Email Addresses, Company Number, Accreditations, Company Insurance details, Historic Correspondence (Physical & Electronic)
- g) Committee Members: Name, Spouse Name, Address, Date of Birth, Work & Mobile Telephone Numbers, Email Addresses, details of a Business Interests or Directorship of any Company, details of Spouse Business Interests or Directorship of any Company, Historic Correspondence (Physical & Electronic)
- h) Users & Visitors of Jordans Village Hall



- a. If you connect to and use our Wi-Fi in Jordans Village Hall, we may collect data about:
 - i. your device;
 - ii. the volume of data which you use;
 - iii. the websites and applications which you access; and
 - iv. your usage by access time, frequency and location.
- i) Subscribers to Jordans Village Community Newsletter: Name, Email Address (Electronic).
 - a. We use a third-party provider, MailChimp, to deliver our newsletter. We gather statistics around email opening and clicks using industry standard technologies to help us monitor and improve our e-newsletter. For more information see [MailChimp's privacy notice](#).
 - b. You can unsubscribe to general mailings at any time of the day or night by clicking the unsubscribe link at the bottom of any of our emails or by emailing our Estate Manager via estateoffice@jordansvillage.co.uk

This list is not exhaustive and, in specific instances, we may need to collect additional data for the purposes set out in this Policy. Some of the above personal data is collected directly, for example when you apply for a share, or apply to join our Waiting List, commence a tenancy, browse our website, or simply send an email to the Estate Office.

HOW WE PROTECT YOUR DATA

JVL is committed to keeping your personal data safe and secure.

Our security measures include: -

- a) limiting the number of people with access to the data
- b) encryption of data;
- c) daily updates of security software;
- d) weekly back-up of data to hard drives and cloud based servers;
- e) internal policies setting out our data security approach and training for employees.

YOUR RIGHTS

You have the following rights:

- a) the right to ask what personal data that we hold about you at any time, subject to a fee specified by law (currently £10);
- b) the right of access to your data;
- c) the right to restrict processing of your data;
- d) the right of data portability;
- e) the right to erase*;
- f) the right to ask us to update and correct any out-of-date or incorrect personal data that we hold about you free of charge; and
- g) the right to opt out of any newsletter communications that we may send you.



If you wish to exercise any of the above rights, please contact us using the contact details set out below.

**Where an organisation holds information for the purpose of an historical archive, they may be exempt from erasing information upon request by the data subject.*

Legal basis for JVL processing customer personal data

General

JVL collects and uses customers' personal data because it is necessary for:

- the pursuit of our legitimate interests (as set out below);
- compliance with our legal obligations.

In general, we only rely on consent as a legal basis for processing in relation to sending newsletter communications to customers via email.

Customers have the right to withdraw consent at any time. Where consent is the only legal basis for processing, we will cease to process data after consent is withdrawn.

Our legitimate interests

The normal legal basis for processing personal data, is that it is necessary for the legitimate interests of JVL, including:-

- a) administration of tenancies;
- b) administration of the Jordans Village Estate, its legal rights, and obligations;
- c) provision of services to residents of the Jordans Village Estate;
- d) sending newsletters and relevant resident communications;
- e) periodic publishing of the Jordans Village Directory;
- f) surveying our residents' preferences, and needs;
- g) complying with our legal and regulatory obligations;
- h) preventing, investigating and detecting crime, fraud or anti-social behaviour and prosecuting offenders, including working with law enforcement agencies;
- i) handling resident communications, queries, complaints or disputes;
- j) the administration of Village Hall bookings, and other Village events;
- k) protecting JVL, its employee, committees, and residents, by taking appropriate legal action against third parties who have committed criminal acts or are in breach of legal obligations to JVL;
- l) effectively handling any legal claims or regulatory enforcement actions taken against JVL;
and
- m) fulfilling our duties to our tenants, residents, shareholders, and other stakeholders.



CONTACT INFORMATION

If you have any questions about how JVL uses your personal data that are not answered here, or if you want to exercise your rights regarding your personal data, please contact us by any of the following means:

- phone us on: 01494 875177;
- e-mail us at: estateoffice@jordansvillage.co.uk or
- write to us at: The Estate Office, The Green, Seer Green Lane, Jordans, Buckinghamshire HP9 2ST

You have the right to lodge a complaint with the Information Commissioner's Office. Further information, including contact details, is available at <https://ico.org.uk>.

WEBSITES

JVL operates two websites, a Facebook page, and Twitter feed:

- Jordans Village www.jordansvillage.co.uk
- Jordans Village Hall www.jordansvillagehall.co.uk
- Jordans Village Facebook <https://www.facebook.com/JordansVillage>
- Jordans Village Twitter <https://twitter.com/jordansvillage> @JordansVillage

Google Analytics

When someone visits www.jordansvillage.co.uk or www.jordansvillagehall.co.uk we use a third party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We don't make, and don't allow Google to make, any attempt to find out the identities of those visiting our website.

UPDATES

This policy was last updated in May 2018.