

Chalfonts Heights Roads Committee Limited (CHRC) is the elected body responsible for maintaining the fabric and character of the Chalfont Heights estate, in accordance with its covenants and founding principles. The committee renews its mandate from residents annually at the annual general meeting.

This policy explains how, and for what purpose, CHRC collects and stores a small amount of your personal information, with your consent, in compliance with the EU General Data Protection Regulation (GDPR), effective from 25<sup>th</sup> May 2018.

We are committed to respecting and protecting your privacy.

For the purposes of data protection legislation (ie. whichever applies of the UK Data Protection Act 1998; the General Data Protection Regulations (EU) as implemented and amended/updated in the UK, and any successor legislation to either the GDPR or DPA), Chalfonts Heights Roads Committee Limited is the “data controller” of your personal information. It is registered in England and Wales with company number 07035456, and its address is PO BOX 1295, 20 Station Road, Gerrards Cross, Bucks SL9 8EL.

The Chairman of CHRC is Peter Gourd, and the Committee members with responsibility for communications are George Eykyn and Jon McGowan. George Eykyn acts as data protection officer, responsible for overseeing questions in relation to our Privacy Policy.

This policy is also accepted and endorsed by the Chalfont Heights Neighbourhood Watch scheme.

### **The personal information we collect**

Personal data, or personal information, means any information about an individual from which that person can be identified. We collect the *minimum* personal information needed to communicate with you on matters of necessity within the Estate.

The personal data which we may collect, store and use fall into three main categories:

- **Identity** data includes your first name, family name, and gender. Our practice is to record the name for the adult (or adults) owning or residing as tenants at each property in the estate.
- **Contact** data includes the name of your property, its postal address, your email address and telephone numbers.
- **Image** data includes images of people or vehicles which are collected by use of CCTV on the Estate. Note that this data is continually overwritten, except in rare cases where the police or others with legal authority ask us to retrieve it.

Where we need to collect personal information about you by law, or to fulfil our obligations to you, and you deny us that information when requested, this may hinder or prevent us performing services we are trying to provide to you. We will notify you if this arises.

### **How your personal information is collected**

- Direct interactions. In the vast majority of cases, identity and contact information is provided by residents who give their consent directly to CHRC by post, phone, email or in person.
- Automated technologies. As explained above, video of vehicular and pedestrian traffic through the estate is recorded by CCTV but this data is overwritten within a short period. It is only accessed if the police or other lawful authorities make a specific request for information.

## **How we use personal information**

Processing of minimal personal information is necessary in order for us to provide the services which residents expect in return for their annual subscription. We rely on that contract as a legal basis on which we process your personal information. We will seek your consent from time to time by contacting you.

Providing you consent, we process personal information about you for these purposes and in these ways:

- to communicate with you to keep you informed about Estate matters which we believe would be relevant to you (e.g. such as communications about the annual general meeting, subscriptions, road maintenance, matters relating to your specific property such as development plans and fees, sale of properties on the Estate, or any issue you raise with us);
- to contact you in emergencies (e.g. if there is a break-in or other incident while you are away);
- to update the statutory books of the company (eg. maintaining the list of members of CHRC Ltd as required);
- to notify you of new planning applications within the Estate, and of significant stages in each application; and
- residents who opt to subscribe to Neighbourhood Watch alerts will receive these Thames Valley Police messages, to the email address they supply, distributed via CHRC.

## **Disclosures of your personal data**

We do not disclose your personal data to third parties. Rare exceptions to this, which we would notify to you, would include:

- police or other lawful agencies for the purposes of detection or prosecution of crime;
- where there is a logistical need, sharing contact details with contractors whom we engage to assist in maintaining the Estate's roads, trees and verges; and
- to the extent that disclosure is required by law or any regulatory authority.

## **CCTV**

We currently use CCTV as outlined below. We believe that such use is necessary for legitimate purposes, including:

- to help the Committee in its duty of maintaining the Estate and in particular to protect the roads, verges, trees and fabric of the Estate from damage by vehicles passing through;
- to protect property and assets from damage, vandalism and other crime; for the safety of residents and visitors; and to act as a deterrent against crime.

This list of legitimate purposes is not exhaustive and other purposes may be or become relevant.

CCTV monitors certain roads in the Estate and data is continuously recorded and overwritten within 3 weeks. Video data is thus only stored for a short period and is deleted on a rolling loop, except on rare occasions when its retrieval has been lawfully requested. Clear signs at each entrance to the Estate alert drivers and pedestrians passing through that CCTV is in operation. Cameras do not focus on private homes, gardens or other areas of private property.

We do not disclose images from our cameras to any third party. However, we may allow law enforcement agencies to view or remove footage where this is required for the detection or prosecution of crime, or if required by law or any regulatory authority.

## **Where and how we store your personal information**

The information we collect from you is held on servers located within the UK. We will use appropriate measures to protect against unauthorised or unlawful processing and against accidental loss or destruction of your personal information. Your contact details are stored electronically on a database file which is password-protected and stored offline, behind up-to-date firewall and antivirus protection.

Access to personal information is limited to serving, elected members of the Committee. These individuals have access to the contact details supplied by residents to enable them to perform their elected duties.

We have procedures to deal with any suspected data breach. In the unlikely event that your personal information became accessible to third parties through a data breach, we would inform you as soon as we became aware of it, and notify the regulator if legally required.

### **Data retention**

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for. Personal information stored on our database will be reviewed annually, and where appropriate we will delete it.

### **Withdrawal of consent**

You can withdraw your consent to any use we make of your personal information at any time by contacting us in the manner set out at the end of this Privacy Policy. We will remind you regularly, in our communications with you, of your right to withdraw your consent for us to collect and store your personal data, and how to do so. CHRC will maintain an audit trail of consent given and withdrawn.

### **Access to information**

Data Protection Legislation gives you the right to access the information we hold about you. We will respond to any valid access request within 30 days (if it is expected to take longer, we will notify you and keep you updated as to likely timescale) and we will make available your information in a format to be agreed. To obtain a copy of the personal information we hold about you please contact us as set out at the end of this Privacy Policy.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights contained in this Privacy Policy). However, we may charge a reasonable fee if requests are clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with a request in these circumstances. In such instances, we would notify you.

### **Erasure or correction of information**

Data Protection Legislation gives you the right to ask us to erase information held about you if it is no longer necessary in relation to the purposes for which it was collected or processed. You also have the right to ask us to correct inaccurate information we hold about you, or to complete incomplete information about you. If you make such a request we will take reasonable steps to comply as per the Data Protection Legislation.

However, the legislation allows us to retain and continue processing your information in certain circumstances. If those circumstances apply we may continue to hold and process your information (in accordance with this Policy) despite your request for us to erase it. Such circumstances include (but may not be limited to) where our continued holding and/or processing of your information is necessary:

- for exercising the right of freedom of expression and information;
- for compliance with a legal obligation that requires processing of personal data by EU or member state law; or for the performance of a task carried out in the public interest; or in the exercise of official authority vested in the data controller;
- for reasons of public interest, in the area of public health;
- for archiving purposes in the public interest, or for historical research purposes;
- for the establishment, exercise, or defence of legal claims.

In our communications with you, we will regularly remind you of the rights you have under this Privacy Policy and of how you can exercise them.

## **Personal information of minors**

We do not knowingly collect or store any personal information about children under 16 years of age. We do not seek any identity information beyond the lead names of the adult(s) living in each property, and/or who own(s) the property. If you are the parent or guardian of a child under the age of 16 about whom you think we may have collected personal information, please contact us. If we become aware that a child under 16 has provided us with personal information about themselves (such as an email address) without having received the consent of their parent or guardian, we will take reasonable steps to erase that information.

## **Changes to our Privacy Policy, and your duty to inform us of changes**

This version of our Policy was last updated on 3 April 2018. We will communicate to you any material changes to our Privacy Policy by email or in hard copy to the addresses provided. This will ensure that you are always aware of the information we collect, how we use it and the circumstances under which we may disclose it.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with Chalfont Heights Roads Committee, especially regarding changes to email addresses or telephone numbers.

## **Right to complain**

If you consider that we have failed to comply with this Privacy Policy and/or Data Protection Legislation in relation to the information about you which we hold or process, you have the right to make a complaint to the relevant UK supervisory authority for data protection issues, which in the UK is the Information Commissioner's Office (ICO): <https://ico.org.uk>. We would appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance in the manner below.

## **Contact**

If you have any requests or queries concerning your personal information, please contact us by emailing [contact@chrc.org.uk](mailto:contact@chrc.org.uk), or by writing to CHRC Ltd, PO BOX 1295, 20 Station Road, Gerrards Cross, Bucks SL9 8EL.