

# Brighton and Hove Community Housing CIC

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## Personal Privacy, Data and Cookie Policy

for

## Public and Members

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### V3.0 Effective 16<sup>th</sup> October 2021

Brighton and Hove Community Housing CIC

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01273 628505

<https://bhchousing.org.uk/>  
office@bhchousing.org.uk

## PRINCIPLES

BHCH endeavours to securely hold and process your personal data, and only data that we need to hold or function.

### Collection

1. We only want to use your personal data that is collected directly from you.
2. We will not seek to collect your personal data from other sources. The exception to this is if you require us to collect your personal information from elsewhere, or when we are obliged by law.
2. We will only collect personal data that is necessary to achieve what is required..
3. We will only collect personal information with your consent, or for an otherwise appropriate lawful basis.

### Using

1. We will only use your personal data when necessary.

2. We will only use such personal data as is required and relevant.
3. Only those authorised by BHCH shall use your personal data.
4. We will only use your personal data as you have consented, or for an otherwise appropriate lawful basis.

### **Holding**

1. We will securely hold your personal data, internally, or externally with trusted suppliers.
2. Access to your personal data will be restricted to only those authorised by BHCH, and only if appropriate.
3. We will only continue to hold your personal data so long as you continue to consent, or for an otherwise appropriate lawful basis.

## **SPECIFICS**

### **Use**

BHCH uses personal data by BHCH for the following purposes.

1. Newsletter administration
2. Membership/company administration
3. Responding to your requests, queries or publicity
4. Obligations under law
5. Dealing with complaints
6. Conversion to anonymous non-personal data
7. Personal safety
8. Fundraising
9. Community engagement and consultation
10. Security and legal defence

### **Storage**

1. Your personal data information will fall into 1 or both of our storage categories of information we hold:

Category 1:                      Company History

Category 2: Legal Liability

2. Category 1: Company History

Core company records form the official history of BHCH. Some records may be legally required to be kept for at least the existence of BHCH as a company or project. Even if not, some are so important to the history of the company/project, they should be kept.

These records will include company accounts, minutes etc.

3. Category 2: Legal Liability

Individual records of your personal information will be securely deleted, or converted to anonymous non-personal information, within 1 year of all the following conditions being met.

- a. BHCH no longer has any possible legal liability concerning or involving the records of your personal information concerned.
- b. A financial transaction has not taken place between you and BHCH in the last 7 years.

## Website

1. Cookies are small files that are stored on your computer that help with the functioning of BHCH's website.

You can block and delete cookies through your browser settings. BHCH strongly advises that browsers are set to delete cookies automatically when closed. We also advise to delete cookies between the accessing of different websites. This helps prevent spying, tracking, and improve security.

The BHCH website will operate with cookies prevented but services and performance may be impaired.

2. Suppliers' domains providing services to bhchousing.org.uk:

- ajax.googleapis.com, fonts.gstatic.com  
Web tools: web font and jquery (hosted software code)  
<https://policies.google.com/privacy>
- membermojo.co.uk  
Newsletter/ membership administration services  
<https://membermojo.co.uk/mm/help/privacy>
- paypal.com  
Payment services  
<https://www.paypal.com/uk/webapps/mpp/ua/privacy-full>

## Suppliers

1. The following suppliers to BHCH process personal information.

- Freeola - email and domain services  
[https://freeola.com/legal/privacy\\_policy.php](https://freeola.com/legal/privacy_policy.php)
- Phone Co-op - telephone and internet services  
<https://broadband.yourcoop.coop/legal/privacy-policy>
- Facebook - social media and advertisements  
<https://www.facebook.com/privacy/explanation>
- Twitter - social media  
<https://twitter.com/en/privacy>
- Unity Trust Bank - banking services  
<https://www.unity.co.uk/privacy-statement>
- Paypal - payment services  
<https://www.paypal.com/uk/webapps/mpp/ua/privacy-full>
- Stripe - payment services  
<https://stripe.com/gb/privacy>

## INFORMATION

### Review and Amendments

1. We will review the policy annually.
2. We will advise changes at least 1 month in advance.

### Information Commissioner's Office

1. You can find more information about the rules and your rights at <https://ico.org.uk/your-data-matters>
2. Contact or complain to the ICO:  
  
0303 123 1113 or 01625 545700  
  
casework@ico.org.uk  
  
<https://ico.org.uk>

### Privacy and Security Measures

The following measures are available to increase security and privacy for your personal information.

- Restrict website scripts to only trusted domains and only temporarily so, clearing regularly
- Restrict cookies to only trusted domains and clear regularly and upon exiting
- Use encrypted communication methods
- Install anti-virus, anti-malware, anti-spyware
- Signout when finished using an online service
- Download emails to email management software
- Install anti-spam software to tackle spam emails
- Check your firewall settings on all devices, including smartphones and internet connected devices
- Passwords to be made up of capital letters, lower case letters, number and symbols
- Don't share your passwords