

Technical Description of how WATA processes Personal Data

(Revision - 30th May 2025)

Data-1: This is a listing of names (Mailing List Data) which consists of Association members' names, email addresses and plot numbers. The Mailing List data is for use when sending out WATA Newsletters, Special Bulletins and any other WATA related notices to plot holders.

In each case of bulk emailing, we make sure to use the Blind Carbon Copy (Bcc :) function to ensure other Members email addresses are not visible.

The Mailing List data is only used for legitimate Association uses. These include:

- Electronic Delivery of Newsletters, Special Bulletins and other relevant information
- Notification of Association meetings including AGMs and EGMs and the minutes of those meetings.

Allotment Tenants can complete a <u>form</u> on the WATA website if they wish (Opting In) to receive the Monthly Newsletter and other relevant information distributed by the WATA Mailing List.

When any Association member vacates their plot, under UK GDPR their information will be deleted from the Mailing List or, if requested via a submitted SAR by the relevant Association member, it will be left on the Mailing List if the allotment member wishes to continue to receive electronic communications information about the WATA.

Mailing List data is kept on a single password protected <u>UK2.net</u> email server and is only accessed when necessary to perform the mailing of Newsletters and other items such as Special Bulletins and other important notices. Account access and Password details are currently held by three Committee Members; the Chair, Secretary and the Data Controller. This Mailing List data is not shared with any other third-party.

Data-2: This is data (CCTV Data) that is collected by various closed-circuit television (CCTV) cameras owned by WATA and operated by the WATA Committee. These are located around the allotment site and are used for the security monitoring of the allotment site. We are currently trialling a Solar Powered camera at the main gate. This also has the ability to be accessed by a remote mobile phone app via a local Wi-Fi setup protected by a unique password. The data control regime is the same as covered below.

The CCTV Data is collected in each camera and stored locally on its own internal memory card. If and when required, each card can be extracted from the relevant camera and the contents downloaded by the WATA Data Controller for analysis on their Personal Computer. Once any analysis is completed, any relevant images will be retained by the WATA Committee Data Controller and may be shared with WTC and/or Policing authorities for any further relevant action.

Depending on what action if any is to be taken, certain images may be retained by the Data Controller on the WATA password protected secure email server as evidence until such time as they are deemed no longer required, after which they will be deleted from the WATA Data server by the Data Controller. Any other CCTV image Data on the CCTV Memory cards/personal computer is erased and the memory cards are returned to their relevant CCTV cameras.





It should be pointed out that if not accessed for security purposes, the CCTV camera internal memory cards are overwritten automatically with new images when full.

Data 3: This is data (Website Contact Form Data) that is collected by the <u>Contact Form</u> on the WATA website. When a visitor to the WATA website completes the WATA website Contact Form; a mechanism inside WordPress (the WATA website hosting platform) converts that Contact Form Data information into an email which is automatically forwarded to the WATA Committee via our email server hosted at UK2.net. All emails are retained within the UK2.net email server environment for action.

Data 4: - This is data (WATA Private Facebook Group Data) submitted by any Association Member that wants to join the WATA Official Private Facebook Group Page. This data is in the form of a number of answers to questions that are asked by the WATA Official Facebook Group Page to verify if the person requesting to join the group is a valid Association member, i.e. is a plot holder at the Reading Road site.

If the questions have been answered correctly, the Association member is admitted to the group, if not then the request is declined with feedback given and the request to join can be submitted again. In either case of being accepted or declined, the page of answer responses is not retained by the WATA Official Private Facebook Group Page and disappears from the Admin view and cannot be further accessed by the WATA Official Private Facebook Group Page Admins. This is <u>Facebook's own Data Policy</u>.

Data 5:- This is data (eShop data) that is used during the purchase of any items from the www.woodley-allotments.org.uk website eShop. Full details of how the eShop works with regards to data processing can be found at www.woodley-allotments.org.uk/our-shop/ and falls within UK GDPR.

Data 6: - This is data (Email Traffic data) that is part of normal email conversations between the WATA Committee/Members and individual Association Members. The WATA Committee uses email to handle most of its administration and communication tasks.

Any communications between Association Members and the WATA Committee or individual Committee Members falls under the UK GDPR regulations.

The main email address that is used to communicate with WATA is readingroadplots@woodley-allotments.org.uk. All email traffic is retained within the UK2.Net email server and no email copies are downloaded to any personal computers/devices. Any WATA Committee member that would need to interact with a WATA member via email would logon to the UK2.Net email server under individual login and password protection and deal with any replies that would be required.

Individual WATA Committee Members may share email communications during internal discussions; however, all email conversations will remain on the same WATA email server at UK2. Net and are not downloaded to any individual personal computer/device.

Data 7: - This is data (Plot Map) that is in the form of an Excel Spreadsheet that is used by the WATA Committee to keep track of which Association Member is working which plot, which Plots are Vacant and when they are reallocated from the WTC waiting list as well as which Plots are unworkable/unlettable. The plot map is kept on a password protected server and only accessed for updating or review by the WATA Committee at their meetings.





In between scheduled Committee meetings, paper copies are retained by the Chair/Vice-Chair and Secretary to be used for intermediate updates should the status of any plots change – i.e. new plot joiners/leavers. When new master updates are created by the Data Controller, old paper copies are collected by the Data Controller then shredded in a Cross-Cut paper shredder and disposed of in accordance with UK GDPR.

We keep the following information on the Plot Map; Association Member's name, plot number and the dates of taking on and/or giving up an allotment.

An example of a Plot Map – from Woodley Town Council, minus all the personal data can be seen on the Notice Board by the main gate which can be used by Association Members for navigation around the Reading Road Allotment site.

This ends the technical description of how WATA handles all personal data. If you have any questions/comments etc., please feel free to <u>email</u> the Data Controller for further information.

