



## WATA Data Protection Policy

(Revision – 30<sup>th</sup> May 2025)

This data protection policy sets out the basis upon which the Woodley Allotment Tenants Association (WATA) located at Reading Road, Woodley, Reading, Berkshire will process any personal data that it collects during its operations. The WATA Committee sets out below, in as transparent a way as possible all aspects of why we hold your data, where we hold your data, what we do with your data, how we control your data, who has access to your data and what rights you have to correct or ask for deletion of your data that is in WATA's possession.

### Legal Requirements

This policy complies with the [UK General Data Protection Regulation \(UK GDPR\)](#), tailored by the [Data Protection Act \(Amended\) 2018](#). Under UK GDPR, WATA has registered with the UK's [Information Commissioner Office \(ICO\)](#) and processes only personal data which is relevant to the management of the WATA allotment site. You can [download](#) a copy of the WATA registration document from our website.

### Personal Data

Personal data will be processed in accordance with the following data protection principles, which are as follows:

- shall be processed fairly and lawfully;
- must be obtained and processed for specified lawful purposes;
- shall be adequate, relevant and not excessive;
- must be accurate and kept up to date;
- shall not be kept for any longer than is necessary;
- shall be processed in accordance with the rights of data subjects;
- must be kept safe and secure at all times;
- shall not be shared with any third-party organisation.

### Processing of your personal data

Under the UK GDPR we control and/or process any personal information about you electronically using the following lawful basis.

- **Lawful basis:**
  - Consent
- **We process your information in the following ways:**
  - **Data retention period:** We will continue to process your information under this basis until you withdraw consent or it is determined your consent no longer exists, for example when you give up your plot.
- **Sharing your information:**
  - We do not share your information with third parties.

### Your individual rights

Under the UK GDPR your rights are as follows:

- the right to be informed;



- the right of access;
- the right to rectification;
- the right to erasure;
- the right to restrict processing;
- the right to data portability;
- the right to object; and
- the right not to be subject to automated decision-making including profiling.

You can read more about your individual rights in more [detail](#) on the Information Commissioners Office (ICO) website. You also have the right to [complain to the ICO](#) if you feel there is a problem with the way we are handling your data.

### Subject Access Request (SAR)

We handle SAR's in accordance with the [UK GDPR](#). If you want to see what personal data we store about you or you want to have your stored personal data edited or have it removed (Opting Out) you can submit a SAR request to the WATA Data Controller. You can do this by completing the [contact form](#) on the WATA website, via [email](#) to the WATA Data Controller or contacting an Admin on the official [WATA Committee Private Facebook Group Page](#). Any electronically collected data during the submission of a SAR will be subject to the same UK GDPR set out in this Data Protection Policy statement. You can find out [more information about SAR's](#) on the ICO website.

WATA does not have a postal address; therefore, any written SAR should be handed to any of the WATA Committee Members on their respective plots which are listed at the end of this Data Protection Policy statement.

## Data security and protection

We ensure the security of any personal information we hold by using secure data storage technologies and precise procedures in how we store, access and manage that information. Our methods meet the UK GDPR compliance requirement. Full details about these follows in the section: What personal data do we keep.

## Confidential or sensitive information

- Association Members may occasionally disclose confidential information to the Committee, for example if illness or family problems are making it difficult to maintain their plot
- This information is only shared between Committee Members, and only on a 'need to know' basis.

## Meeting and Minutes

- WATA Committee meetings are held at least quarterly.
- WATA Committee minutes, which may include member names and plot numbers, are emailed to WATA Committee Members. However, these minutes are redacted to remove personal data if posted on noticeboards and website.
- Minutes of the WATA Committee meeting summaries', AGM's/ECM's and WATA/WTC meeting summaries', including names of any attendees, may be posted on the WATA website.



## Bank Account

The WATA bank account is currently held with Lloyds Bank plc. WATA Committee Members who are signatories on the bank account are able to view Lloyd's statements which may contain information about WATA Members' direct electronic payments into the WATA bank account.

## What personal data do we keep?

We are only allowed to keep data that is necessary for our WATA activities. There are a number of types of data that we keep. Detailed descriptions of how we process each of these data sets can be found by downloading our [Technical Description of how WATA processes Personal Data](#) document from our website.

## Data Backups

All relevant WATA data is backed up regularly by the Data Controller onto a UK GDPR compliant password protected cloud server hosted at [Box.com](#). Access logins and password are held by the WATA Committee Data Controller and the WATA Committee Secretary. A list of committee members and their roles can be found at the end of this Data Protection Policy statement.

## Website Privacy Policy

We are committed to safeguarding the privacy of our website visitors.

### What information do we collect?

We may collect, store and use the following kinds of personal data:

- information about your computer and about your visits to and use of this website (including your IP address, location, browser type, referral source, length of visit and number of page views)
- information that you provide to us for the purpose of subscribing to our website services, email notifications and/or newsletters
- any other information that you choose to send to us

### Website Cookies

- A cookie consists of information sent by a web server to a web browser and stored by the browser. The information is then sent back to the server each time the browser requests a page from the server. This enables the web server to identify and track the web browser.
- We may use session cookies on the website. We will use the session cookies to: keep track of you whilst you navigate the website. Session cookies will be deleted from your computer when you close your browser.
- These cookies are used to collect information about how visitors use our site. We may use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and pages visited.
- Most browsers allow you to reject all cookies, whilst some browsers allow you to reject just third party cookies. You can of course block all cookies if you wish; however, blocking all cookies may have a negative impact upon the usability of many websites. More [info about cookies](#) on the ICO website.



### Website - Using your personal data

Personal data submitted on the WATA website will only be used for the purposes specified in this privacy policy or in relevant parts of the WATA website. We may use your personal information to:

- administer the website;
- improve your browsing experience by personalising the website;
- enable your use of the services available on the website;

### Website - Third party websites

The website may contain links to other websites. We are not responsible for the privacy policies or practices of third party websites.

### WATA Committee Members and their Plots

Chair - Mike McNamara (F12)

Vice-Chair - Teresa Buley (E18)

Treasurer - TBA

Secretary - Wendy Wilkinson (J23)

Peter Buley - (E18)

Caroline Chaytor (K25a)

Debbie Ballard (K25a)

Mike McNamara (F12) - Website Admin & Data Controller

Many thanks

**Mike McNamara - Chair**

[chair@woodley-allotments.org.uk](mailto:chair@woodley-allotments.org.uk)