

LHML General Data Protection Regulations Policy

(Date for review: May 2022)



LHML takes its responsibilities under the General Data Protection Regulations (GDPR) (2018) seriously. We will strive to comply with the legal requirement to treat the personal data we hold on shareholders/ owners, directors and other volunteers, and data we hold about our contractors, lawfully, correctly and in compliance with the GDPR (2018).

The GDPR entitles shareholders/owners, directors, other volunteers, and contractors to know what personal information we keep on them, how we keep it safe, who has access to it, and how we dispose of it when it is no longer required, how they can access it, amend it if it is incorrect, ask for it to be erased in some circumstances, and how complains can be made.

The GDPR also means that our Board of Directors, other volunteers, and third parties must comply with these regulations in relation to the personal data they are responsible for about our shareholders/owners and contractors.

The Chair of LHML is the company's overall data controller and the Treasurer and the Secretary are the company's data processors. Designated directors and other volunteers may have access to specific contractor's information when managing and monitoring projects and delivering services.

We are required to keep the personal data we hold confidential, only use it for the purposes intended, do our best to make sure it is accurate and up-to-date, and dispose of it properly when it is no longer required. A copy of this policy will be made available to individuals and companies we hold information on, and they will be asked to give their consent, in writing, to their personal data being held by us.

We have set out below how we comply with the GDPR regulations.

1. What personal information do we keep on our:

SHAREHOLDERS/OWNERS?

- We keep personal information related to property ownership, e.g.
 - Name, address, telephone number, email address of owners
 - Shareholder information- e.g. share certificates, company house submissions
 - Service charge information- amount, arrears, credits
 - communications to the Board of Directors and our responses regarding issues, complaints etc.
 - Information regarding attendance at general meetings, proxy votes etc.
 - Property conveyancing information- letters to and from solicitors and estate agents regarding the sale and /or purchase of properties, and ownership changes
 - Permissions given by the Board of Directors e.g. for property alterations, pets, lettings.
 - Copy of title plans
- **DIRECTORS AND OTHER VOLUNTEERS?**
 - Directors- company house information, name, address, date of birth, nationality, signed agreement to be a director etc.

- Bank account details for reimbursement of monies spent on behalf of LHML.
- CONTRACTORS?
 - Name, address, telephone numbers, email addresses
 - Bank account details
 - Invoices and remittance advices
 - Tender documents and tender prices

2. How do we use this personal information?

- SHAREHOLDERS/OWNERS
 - To communicate with you.
 - To provide information about general meetings of the shareholders.
 - To provide information about the operation of the Board of Directors and the estate.
 - To manage the service charge budget.
 - To inform owners about the goods and services for the communal areas and parts of the estate.
 - To issue owners with service charge invoices.
 - To monitor service charge payments.
 - To assist owners in conveyancing matters.
 - To respond to queries and requests for permissions.
 - To resolve disputes.
 - To make returns to Companies House.
 - To record accidents in communal areas of the estates.
- DIRECTORS AND OTHER VOLUNTEERS
 - To provide information to Companies House related to your appointment/resignation as a director (directors only).
 - To reimburse you for monies spent on behalf of the Board of Directors (directors and other volunteers).
- CONTRACTORS
 - To manage and monitor goods and services delivery.
 - To pay invoices.
 - To award contracts.
 - To record accidents in communal areas and parts of the estate.

3. How long do we keep this information?

- SHAREHOLDERS/OWNERS
 - Information is kept for as long as you are an owner/shareholder and for at least 2 years after the sale of your property. Financial information is kept for 6 years.
- DIRECTORS AND OTHER VOLUNTEERS
 - Contact information is kept for as long as you are a director.
 - Information relating to the running of the company is kept for 12 years.
 - Information relating to directors/ volunteers' reimbursements is kept for 6 years.
- CONTRACTORS
 - Information is kept for as long as goods and services are provided, and for at least 6 years thereafter.

4. How do we keep your personal information up-to-date?

- You must tell us if your personal information changes e.g. your contact information, your ownership position, your bank details, as appropriate.

- Directors must tell us if they are convicted of an offence that could prevent them being a director of the company.
- We review and update our records annually.

5. How do we keep your personal information confidential and secure?

- Paper records are kept in secure filing cabinets.
- Electronic records are kept on secure computer systems, password and network protected.
- Only designated persons have access to this information.

6. What information do we provide to third parties?

- Shareholders'/Directors' personal information- to Companies House
- Shareholders/owners- names/addresses/ service charge information- to the company's accountant.
- Contractors- if required- to statutory organisations e.g. HMRC.

7. Your right to check the information we hold about you.

- If you would like to know what information we hold about you- you should complete the GDPR information request form attached to this policy and submit it to the Chair of the Board of Directors.
- You will be given access to/provided with this information within 30 days.
- If any information about you is incorrect, we will amend it if you provide us with the required proof.

8 How do we dispose of information about you when it is no longer required?

- We shred paper records
- We delete electronic records.

9. What do I do if I have a complaint about the management of my personal data?

- You should raise your complaint with the Chair of the Board of Directors using the company's Complaints Procedure.
- If you are unhappy with the company's response you can complain to the Information Commissioner- helpline 0303 123 1113.

10. How do we monitor the effectiveness of our data protection system and processes?

- We review our data protection systems and procedures biannually.
- We review our policy every 3 years, or earlier if there is a change in legislation.

11. How do we train our directors, and other volunteers, on data protection?

- This policy is made available to all directors and other volunteers.
- Our policy specialist provides briefings to directors and other volunteers.

12. Consent

- You will be asked to give your written consent to LHML holding and using data about you by signing a declaration- see below.

13. Confidentiality

DIRECTORS AND OTHER VOLUNTEERS

- Directors and other volunteers will be asked to acknowledge their responsibility for keeping information, which they have access to in the course of their roles, confidential by signing a declaration as shown below.

14. PROFORMAS

GDPR CONSENT	
Name:	
Address:	
I have received and read a copy of LHML's GDPR policy and give my consent to personal information being kept and used by the company. I will provide updated information to LHML if my/our personal information changes.	
Signed	Date
Status: <input type="checkbox"/> SHAREHOLDER/OWNER <input type="checkbox"/> DIRECTOR/VOLUNTEER <input type="checkbox"/> CONTRACTOR	
Please return to: Email: mandy.hermitt@gmail.com Post: Secretary LHML, 20 The Gardens, Lawton Hall Drive, Church Lawton, Stoke-on-Trent. ST7 3BG.	

GDPR CONFIDENTIALITY AGREEMENT -DIRECTORS AND OTHER VOLUNTEERS	
Name:	
Address:	
I will keep confidential information about shareholders/owners, contractors, and others that I have access to in the course of my role as a director/other volunteer.	
Signed	Date
Please return to: Email: mandy.hermitt@gmail.com Post: Secretary LHML, 20 The Gardens, Lawton Hall Drive, Church Lawton, Stoke-on-Trent. ST7 3BG.	

GDPR INFORMATION REQUEST		
Name:		
Address:		
I would like to see:		
Tick as appropriate		All the personal information held on me by the company.
		Specific information held on me by the company: Please provide details.
Signed		
Date.....		
Status:		
<input type="checkbox"/> SHAREHOLDER/OWNER <input type="checkbox"/> DIRECTOR/VOLUNTEER <input type="checkbox"/> CONTRACTOR		
Please return to:		
Email: mandy.hermitt@gmail.com		
Post: Secretary LHML, 20 The Gardens, Lawton Hall Drive, Church Lawton, Stoke-on-Trent. ST7 3BG.		