



Data protection and GDPR policy

Version 4.2
Date 11/08/23

1 Introduction

Alamo Housing Co-operative Ltd is committed to ensuring that all members' personal information is held, solely, to enable the Co-operative to deliver its functions as a Landlord. The General Data Protection Regulation 2016 (GDPR) came into force on 25 May 2018. The 'UK GDPR' sits alongside an amended version of the Data Protection Act 2018. This new legislation replaced the Data Protection Act 1998.

Alamo Housing Co-operative Ltd recognizes that modern technology has changed and this has increased the volume of personal data that organisations collect and hold. As such, the Co-operative supports and welcomes the change in legislation through the GDPR.

2 Principles of the GDPR

The GDPR seeks to uphold 6 principles when processing individuals personal data. This covers the collection, storage and use of data held. If misused, this breaches individual's rights for their personal data to be protected. The 6 principles are:

- Personal data must be processed fairly, lawfully and transparently;
- Personal information collected must be used for specified, explicit and legitimate purposes;
- Data held must be adequate, relevant and limited to what is necessary for the purpose;
- Data must be accurate and up to date;
- Data must not be kept longer than necessary; and
- Personal information must be processed in a way that ensures security of data against unlawful processing, accidental loss, destruction or damage.

3 Objective of the Policy

The objective of this policy is to comply with changes to legislation which replaces the Data Protection Act 1998.



Alamo Housing Co-operative Data Protection and GDPR Policy



4 Legal Grounds

The GDPR sets out legal grounds under which organisations may process personal data. Of these grounds Alamo Housing Co-operative will rely on the following three grounds:

- Necessity for compliance with a legal obligation;
- Necessity for the legitimate interests of a data controller; and
- Consent

5 Communication and how we will store personal information

Alamo Housing Co-operative is required to demonstrate that we comply with legislation, so we will produce key documents that explains what data will be held, how we will collect the data and what we will do with it.

This policy informs our members how we will comply with legislation. In support of this policy we also have a Privacy Notice. This should be read in conjunction with the Data Protection Policy as it explains why we hold members data and how it will be processed.

The GDPR lays down what information we must have in the Privacy Notice and includes:

- The identity and contact details for the person(s) responsible for data protection;
- The purpose and legal grounds for processing data;
- The recipients of the personal data;
- The expected length of time the data will be stored;
- Your right to access, restrict or erase personal data held; and
- The right to complain to the Information Commissioner's Office (ICO)

6 Sharing data with Third Parties

Alamo Housing Co-operative works with a number of third parties to fulfil its purpose as a registered landlord.

The GDPR defines clearly the roles when managing data. The 'Controller' (Housing Co-operative) and the 'Processor' (Third Party).

The definition of 'Controller' and 'Processor' are:

Data Controller – "the organization that determines how and why the data should be collected and processed."

Data Processor – "the person / organisation that processes the personal data strictly on the instruction of the Controller."

Alamo Housing Co-operative Data Protection and GDPR Policy



7 Data Breaches

A data breach is defined as: “a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed.”

Under the legislation of the GDPR Alamo Housing Co-operative has a duty to report any data breaches within 72 hours after it is discovered where a ‘risk’ to an individual is identified. All ‘Processors’ we use will also have a duty to inform the Co-operative ‘Controller’ Immediately.

In instances of ‘high risk’ breaches where it is identified that the breach may cause discrimination, identity theft, damage to reputation or fraud of a member, the member will be informed immediately.

8 Access to Data

All members / potential members of Alamo Housing Co-operative have the right to access their information and can request that the Co-operative informs them of:

- The purpose of processing;
- The categories of the personal data held;
- The recipients of the personal data;
- How long the information will be held;
- The right to lodge a complaint;
- Where data was not collected directly from the member, how the data was sourced;
- The consequences of processing

Further information on the above can be found in our Privacy Notice.

Members can request copies of their personal data that is being processed.
All requests must be placed in writing to:

The Data Controller,
Alamo Housing Co-operative,
198 Blackstock Road, London N5 1EN.

Requests will be processed within one month of receipt of the request.

Alamo Housing Co-operative Data Protection and GDPR Policy



9 Monitoring and Reporting

The Executive Committee will review requests for data held and any breach identified on a quarterly basis.

A data controller report will be presented to the Annual General Meeting and will include the number of requests for access to data received and the number of breaches within the 12 months.

10 Policy Review

This policy will be reviewed every 3 years. It will be reviewed sooner if there are further changes to legislation.