

## DATA POLICY STATEMENT AND PRIVACY NOTICE

#### What this Data Policy Statement and Privacy Notice covers

The Compulsory Purchase Association ("CPA") is committed to protecting your personal information. In this notice, references to 'we', 'us' or 'our' mean CPA. This notice explains how we collect and use the personal information about you.

#### Who we are

- The CPA is a private limited company by guarantee under registration number 10493489. The registered office is 4a Woodside Business Park, Whitley Wood Lane, Reading, RG2 8LW.
- The CPA operates the website www.compulsorypurchaseassociation.org (the "website").
- The CPA is a data controller under the General Data Protection Regulation (GDPR).
- The CPA have appointed CPT as the CPA's administrator ("the CPA's Administrator"). CPT acts as a data processor, on behalf of the CPA, as defined by GDPR.
- CPT is a private limited company under registration number 2563495. The registered office is 12 Sheaveshill Parade, Sheaveshill Avenue, London, NW9 6RS.

## **INFORMATION WE GATHER - FOR MEMBERS**

#### Where do we get your contact details from

Data we hold has been provided directly by you on your membership application form, and may have been updated by your request or may have been updated by the CPA's Administrator if known to be out of date. The data held may include your name, professional qualifications, job title, business name, twitter handle together with your contact address, telephone number, fax number and e-mail address.

## The need to keep us informed of your current contact details

It is the responsibility of the member to keep us informed of appropriate contact details.

Failing to do so may mean you are not sent publications and annual subscription demands for members - an unpaid subscription will ultimately result in your membership being cancelled.

#### Use of your information

We will use your information to:

- a) administer your membership and communicate as necessary in relation to it;
- maintain relevant contact with you with information we consider of interest to you as a member of the CPA, including, but not limited to: matters relating to CPA business and activities, compulsory purchase practice and market information; and
- c) maintain the member directory on the website (except where you have chosen to opt out of having your details listed in the membership handbook). You will have given us your preferences at the time of joining. If you wish to amend them subsequently, please inform us at cpa@compulsorypurchaseassociation.org

## What is the legal basis of processing your data

The legal basis of processing members' data is by 'contract' where processing is necessary for the performance of a contract of membership between us and you.

If you cease to be a member, the CPA:

- will cease communicating on membership matters;
- will retain the records of the contract for a period which is legally required and deemed reasonable; and
- may continue to communicate with you on the basis of being a non-member (see below).

If you exercise your right to be forgotten whilst a member, or refuse consent to processing, the CPA will terminate your membership and there will be no refund.



#### **INFORMATION WE GATHER - FOR NON-MEMBERS**

## Where do we get your contact details from

Your information can be collected from:

- a) email, post, fax and mail correspondence with the CPA;
- b) information we gathered via events;
- c) contact via phone; and
- d) in-person contacts with CPA officers, members, affiliates and the CPA Administrator.

#### We will use your information to:

- a) share CPA and compulsory purchase related matters with you where we feel you may have a legitimate interest; and
- b) where relevant, investigate any issue in connection with our members.

#### What is the legal basis of processing your data

We may rely on legitimate interest, a legal obligation or consent in contacting you.

#### How long will we keep your information

Your personal data will be retained for as long as necessary for the purposes listed above. If you do not wish us to contact you or want your data deleted, you may exercise your right to be forgotten. See below

## IN RELATION TO ALL DATA

## Processing and retention of data, whether member or non member

- The CPA's Administrator collects your information. If you are a member your information is stored on our membership database and if you are a non member data is stored on a separate database. The CPA's Administrator is permitted to make alterations to any information held on that database.
- The CPA's Administrator is required to comply strictly with our instructions and data protection laws.
- Organisational and technical measures are in place to protect your information against unauthorised access, modification or misuse.

### Website

There is a separate notice on our website as to how we manage the operation and performance of our website and the use of Cookies.

# How to keep us updated with any changes to your information

We would like you to keep us updated if the personal data we hold on you is inaccurate or incomplete. All requests to update your personal data must be via an email to cpa@compulsorypurchaseassociation.org

## Your rights

You have the right to:

- a) Update us and have any inaccuracies in your data corrected.
- b) Request that we delete your personal data.
- c) Request a copy of the personal information we hold about you.

If you wish to see what data we hold on you we will require you to write to us on suitable letterhead and signed. You may also be required to prove your identity. The letter needs to be sent by registered post.

## **Enquiries**

Please contact us if you have any enquiries arising from this Statement and Notice or any concerns over our handling of data. We will always treat any enquiry with care:



- 1. In the first instance, please do so via the administrator <a href="mailto:cpa@compulsorypurchaseassociation.org">cpa@compulsorypurchaseassociation.org</a>
- 2. If your query remains, contact an officer: <a href="www.compulsorypurchaseassociation.org/cpa-management-board.html">www.compulsorypurchaseassociation.org/cpa-management-board.html</a>
- 3. If you remain unhappy with the CPA response, you have the right to then contact the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF

## **Review of CPA Privacy Notice**

This Statement and Notice was last reviewed in April 2018. We may update the terms of this Statement and Notice at any time, so please visit the Statement and Notice on our website for any changes.