

LYNDEN GATE RESIDENTS LTD

The Gatehouse
Lynden Gate
Portsmouth Road
London SW15 3TJ
020 8785 2061

Lynden Gate Data Protection Policy

- 1) Lynden Gate Residents Ltd (LGR) is aware of the provisions of the:
 - i) Data Protection Act 1998
 - ii) EU General Data Protection Regulations (from 25 May 2018)
 - iii) Data Protection Bill 2018and the associated guidance by the Information Commissioner (ICO.org.uk)
- 2) LGR is a not-for-profit organisation, which aims to hold and process personal data lawfully, fairly and transparently, in accordance with the principles of the legislation.
- 3) LGR is registered as a data controller, ref ZA154554.
- 4) Personal data is held by LGR for use in the administration of the normal residential and business matters concerning the residents and employees.
- 5) LGR processes personal data in three forms a) the contact details of the residents (ie shareholders and tenants) b) the contact and employment details of employees c) CCTV images of the estate roadways.
- 6) The lawful bases for processing data required by GDPR are as follows:
 - a) Contact and employment details are processed under Article 6(1)(b) *"processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract"*.
This enables communications with residents, such as the purposes and activities set out in the Title Deeds, Covenants and the Articles of Association of the company. It enables the administration of employment contracts.
 - b) Employment details are also processed under Article 6(1)(c) *"processing is necessary for compliance with a legal obligation to which the controller is subject."*
This enables matters such as disclosure of salary data to HMRC.
 - c) CCTV images are processed under Article 6(1)(f) *"processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are"*

overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.”

CCTV images are used solely for the prevention and detection of crime, in the interests of the individual residents and the residential community.

- 7) Personal data is only transferred to third parties where this is either a) a legal obligation or b) necessary for the contract with the residents or employees and part of normally accepted procedures such as the delegation of administrative matters by LGR to professional advisers including accountants, solicitors and surveyors.
- 8) In exceptional situations, where a crime is suspected, CCTV images may be shared with the Police.
- 9) All LGR directors and employees will maintain appropriate levels of confidentiality for any personal data to which they have access.
- 10) Data subjects have the rights, including of access and rectification of incorrect data, as set out in the legislation. See www.ico.org.uk. Any changes to personal data or to data policy that are deemed necessary under the legislation will be undertaken without delay.
- 11) Personal data will normally be erased once a shareholder sells their property and is therefore no longer a member of the company, when a tenant vacates a property, or when an employee leaves employment. Contact details may sometimes be retained to enable continued social contact. CCTV records are overwritten on a regular monthly cycle.
- 12) Any queries regarding Data Protection procedures, or subject access requests for personal data, should be referred to the Company Secretary at the above address.

Latest update: March 2018