

# Benenden's Community Shop Privacy Notice

## What type of information we have:

Shareholders & Members: Name, address, email, and the value of your shareholding, and how you paid for them (cheque / cash / bank transfer).

Volunteers: Name, address, email, contact phone number, experience / interests in volunteering.

Customers: Image (via CCTV), name and order details.

Team members: Name, address, email, emergency contact details, images (via CCTV) bank details, NI number & tax code, pay, and details of sick, holiday and disciplinary records.

## How we get the information and why we do we have it:

Shareholders & Members: We collect and hold information when you purchased shares / membership. We need to know who our shareholders are, and how to contact them, so that we can keep you up to date about your stake in the Shop and so you can exercise your voting rights. We need to know the value of your shareholding in case you wish to withdraw or transfer shares.

Volunteers: We collect and hold information to help determine how you can help us as a volunteer, and so that we can contact you about volunteering., or for emergency use. If you work on the till you have a personal ID that tracks the transactions that you process.

Customers: We collect images of customers (and Volunteers, Team Members working in the Shop) via CCTV and hold these for limited period of time (around 7 weeks). We use this as a deterrent to aid crime prevention and detection.

Team members: We collect information to enable us to recruit and pay staff, administer our policies (sick, holiday etc) and make payments to the UK tax authorities. We also hold emergency contact information in case of emergencies. Staff who work on the till have a personal ID that tracks the transactions they process. We collect images of those working in the Shop via CCTV, and may use these to aid investigation of disciplinary matters.

# Benenden's Community Shop Privacy Notice

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## What we do with the information:

**Shareholders & Members:** We hold this information on the Company Secretary's laptop, and on a back-up disc held in the Shop. We also use MailChimp to hold contact information so we can send e-mail updates, meeting invites etc.

**Volunteers:** We use MailChimp to hold contact details so we can update you about the Shop. We occasionally use detailed transaction information to help identify errors or queries with till use, and may use this to prevent or detect crime.

**Customers:** We store CCTV images on the CCTV system in the Shop. Images may be shared with local law-enforcement or other local traders.

**Team members:** We hold information on our accounting system (Xero) and pass information to the tax and benefit authorities where legally required. The HR lead holds recruitment, work entitlement, and key employee details, and the Shop Manager hold sick and holiday information in hard copy format as well as on the Shop system. We store CCTV images on the CCTV system in the Shop. Images may be shared with local law-enforcement if required.

You can find out more about Mailchimp at their website: [www.mailchimp.com](http://www.mailchimp.com)

## How we store your information:

**Shareholders & Members:** We keep the information we hold for as long as you are a shareholder or member, and then for around a year afterwards. We will shred paper-based records and delete your details from our system, back-up and from Mailchimp.

**Volunteers:** We keep the information we hold for as long as you are a volunteer, and then for around a year after you tell us you've stopped volunteering. We review our volunteer records every at least annually to identify those that we know have dropped out.

**Customers:** CCTV images are over-written every regularly, unless we need to make a special copy for law-enforcement or staff training. The Police may retain images for prosecution purposes.

**Team Members:** Basic employment details are held by the HR lead on a laptop, and in hard copy. Date is held for as long as required by UK Government tax / benefit authorities (3 years / 7 years), and then deleted. CCTV images are held as outlined above.

## How to complain:

For any data protection questions please contact the Shop Manager, at:

**Address:**

Benenden's Shop & Post Office  
The Street, Benenden  
CRANBROOK  
TN17 4DB

**Phone:** 01580 279808

**Email:** [info@benendens.co.uk](mailto:info@benendens.co.uk)

You can also complain to the ICO if you are unhappy with how we have used your data.

**The ICO's address:**

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
Helpline: 0303 123 1113

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## Your data protection rights:

We process your information under a number of '*lawful basis*' for holding and processing data. Specifically:

Shareholders & Members: We have a *contract* with you which means we have to tell you about the Shop at certain specified events. You have also *consented* to us holding and processing your data if you have signed-up to our email contact list.

Volunteers: You have given us your *consent* to hold your information, and to contact you about your volunteer work at the Shop. It is in our *legitimate interests* to use CCTV to deter and detect crime against our business.

Customers: We may have a *contract* with you for goods. It is in our *legitimate interests* to use CCTV to deter and detect crime against our business.

Team members: You have given us your *consent* to hold your information, and to contact you about your work at the Shop. It is in our *legitimate interests* to use CCTV to deter and detect crime against our business, and to aid investigation into disciplinary matters.

Under data protection law, you have rights including:

Your right of access: You have the right to ask us for copies of your personal information.

Your right to rectification: You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure: You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing: You have the right to ask us to restrict the processing of your information in certain circumstances.

Your right to object to processing: You have the the right to object to the processing of your personal data in certain circumstances.

Your right to data portability: You have the right to ask that we transfer the information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.