

# Privacy and Data Protection Policy



Wadsworth Area Community Assets Ltd  
Approved by the Board: 23 August 2025

Wadsworth Area Community Assets Ltd (henceforth WACA Ltd or the society) commits to full compliance with the requirements of the Data Protection Act 1998 and the General Data Protection Regulation, in force from 2018.

WACA Ltd will follow procedures to ensure that all trustees and staff/consultants are fully aware of and abide by their duties under data protection legislation.

WACA Ltd currently maintains the following records covered by data protection legislation:

- Electronic records of the society's members, including addresses, email addresses (where supplied), telephone numbers (where supplied), community shares purchased, held or refunded, wishes for the disposal of shares in the event of the member's death.
- Electronic records of meeting minutes and correspondence, which may contain data covered by data protection requirements.
- An online mailing list used for online mailings and marketing, compiled from sign-up sheets circulated at public meetings, and augmented from a sign-up form on the society's website.

## Retention of Data

Membership records will be retained for 7 years after the member ceases to be a member of the society.

Minutes of society meetings will be retained without time limit.

Email correspondence of members acting on behalf of the society will be retained for 7 years to facilitate retrieval for legitimate subject access requests.

Names of people not identified as members who unsubscribe from marketing emails will not be retained.

Unsubscribing from emails addressed to members does not result in the membership record being expunged.

## Direct marketing

The society will use its mailing list and other channels of communication to promote community share issues and to inform interested parties about the society's activities and events.

## Fundraising

The society uses its mailing list to solicit funds and promote fundraising events in support of its operational funding requirements.

## Third parties

The society undertakes not to sell or pass its databases to third parties.

## **Membership records**

Membership records will be held securely using appropriate software with access control, and will be managed in accordance with the rules of the society. Hard copies of membership records will be produced at intervals and retained by the Membership Secretary and at the Registered Office of the Society.

## **Website**

The society does not generally make use of information collected on its website by cookies, which may be set by the enabling software for the purpose of managing sessions with logged-in users.


## **Email**

Bulk emails will be sent using software that identifies the message as from a mailing list and offers the opportunity to unsubscribe. Mails to small groups of members may be sent from an individual email account, but should not divulge other addressees in the absence of explicit permission for email addresses to be shared. The directors are assumed to have agreed to their addresses being shared amongst each other.

## **Data Controller**

The society has appointed its Membership Secretary (Helen Plaice) as Data Controller. All subject access requests should be addressed to the Data Controller.

## **Agreed by Board of Directors**

**Signed:** 

**Date: 23.8.25**

**Name: Helen Plaice**

**Role: Chair**

**Due for Review: 23.8.28**

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