



WCA Cockermouth Limited Policy on Compliance with GDPR

3rd November 2023

As the not-for-profit owner of the freehold title of Wordsworth Court, and the lessor of the apartments in the building, WCA needs to collect certain personal information relating to our leaseholders. Leaseholders are also our shareholders.

We need to manage data about our leaseholders, employees and others lawfully and responsibly. As data controller, we not only need to collect, hold, process, store and use that information, we also need to do so in ways that keep it secure in accordance with the Data Protection Act 2018 and other applicable legislation (GDPR) from time to time. This means that the information we hold about our leaseholders/shareholders is processed for limited purposes; is kept updated, accurate and relevant; is not excessive; is not kept longer than is necessary; and is kept securely.

You must always consent to WCA sharing part of your personal information. We will not share discuss your personal information with any third party without your consent or in accordance with the law or as specified below.

The information may be collected in a variety of ways, including in-person, in paper form and electronically. We need to hold details of the owners of the leases at Wordsworth Court and their ownership of shares in Wordsworth Court Apartments Limited. This may include:

- name and address;
- bank details (eg. if a Direct Debit mandate has been completed);
- service charge and sinking fund details;
- shareholding details;
- contact details e.g. by phone, post or email; and
- any third-party details provided to us for contact in the event of an emergency.

We may use information in a variety of ways:

- to collect or manage service and sinking fund charges;
- to contact you about relevant matters that may affect you;
- arrange repairs when access to your apartment or further information is needed from you or is required by our contractors;

Except where agreed, only our Estate Manager and, if necessary, officers of WCA Board (to ensure compliance), will be able to see and process personal information. However, there may be times when we need to share relevant information with others. When necessary, this will be done on a strictly need to know basis and we will comply with the Data Protection Act and other relevant legislation.

Where necessary or required, we may share personal information with:

- WCA's contracted property management company, who will implement the terms of WCA's Data Protection Compliance Policy;
- third party service providers in connection with services that need to be carried out on our behalf. For example, sub-contractors, solicitors and other service providers on a need-to-know basis;
- insurance providers and their agents;
- Police and local council when requested to do so; and
- Companies House for the purpose of registering individuals as Directors or officers of WCA should they volunteer to serve in that capacity.

We will store the information provided by leaseholders/shareholders for as long as they remain leaseholders/shareholders plus six years. We are committed to ensuring that your information is secure. WCA will take technical and organisational measures to protect the confidentiality and security of personal information, irrespective of the method of collection.

Leaseholders/shareholders have rights under the Data Protection Act and the GDPR regarding the information WCA processes about them. These rights include the right to access the personal information that we hold about them, to know what we hold, what format it is in, and to have a copy of it if desired. This is called a Subject Access Request (SAR), a more formal process than, for example, requesting something like a copy of a statement of account. Our Estate Manager will explain when an enquiry is a SAR. Leaseholders/shareholders also have a Right to Erasure/Right to be Forgotten and ask that data held by WCA about them is deleted, subject to laws that may require us to retain it.

Any requests should be directed to the Estate Manager and the Chair of WCA.