

Ipswich Ripple Community Interest Company - Statement of Privacy and Legitimate Interest: Including GDPR Compliance action plan

At a glance Summary:

- We are Ipswich Ripple Community Interest Company, also known as Ipswich Ripple 'food co-op'.
- We do not collect, store or process any special category personal data (information) about our members.
- We do not sell your personal data to anyone.
- We have assessed our **lawful basis** for collecting, storing and processing your personal data to be one of **Legitimate Interest**. This is because we process your data through the course of running the Company, that is communicated to you on joining, through your New member information, available on the Website and outlined in the main Policy below.
- We do use third party products - IT Software & web-based applications for storage, purchasing and enabling contact between members- in order to carry out the legitimate business activities for all members, but we remain the data controller in all cases .
- All information we hold about our members is freely given by individuals upon payment of subscription, for the purpose of becoming and remaining a 'member' of Ipswich Ripple CIC. To demonstrate this, there is an expectation that Members will *actively agree*, through email response.
- On Renewal of Membership, we will remind you of your rights to control the data we have, by reissuing the Privacy Statement.
- You have the right to be informed of what personal information we hold, why and for how long.
- You have the right to view, amend and correct any inaccuracy and request deletion of your data and to terminate your membership (Note: No membership subscription will be returned)
- No personal data is required by Companies House. Total membership numbers are collected annually by the Treasurer/Book-keeper/ Company Secretary. these are communicated to the Directors and used for the Annual Company statement, to justify that we are still carrying out it's '*community interest*' function.
- Anyone who purchases items at our trading session must be a member, but there are 3 levels of membership - Day, Full and Active - and therefore some differences between what information is collected, stored and shared about you regarding the following:
 1. Membership number (as allocated to you on joining),
 2. Name,

3. Email address,
 4. phone number,
 5. purchase information (including cheese and suma personal orders),
 6. attendance at session,
 7. date of joining,
 8. membership fees paid,
 9. membership expiry,
 10. number of volunteering 'helps',
 11. Emails sent via the website or to ipswichRippleCIC@googlemail.com, and
 12. any other details that you chose to share via till notes.
- You are in control of what you share, but ideally email and at least one other contact means will be supplied by all members to allow role holders to carry out the tasks needed to operate.
 - You have the right to contact the ICO (UK Government appointed Independent Authority - Information Commissioners Office) if you have any concern about our practices with regards to your personal data. (Tel: 0303 123 1113 or webchat available via <https://ico.org.uk/make-a-complaint/>)

Company Background & legal status:

Ipswich Ripple is a Community Interest Company, registered with Companies House as a Private company limited by guarantee without share capital , Incorporated 27 September 2006, Company No. 5947958.

As such we are required by law to have Directors and a Company Secretary registered with Companies house and our Annual Report and Unaudited financial statement available for public view via the Companies House website. No personal membership details are submitted as part of the annual accounts and statement. We base our operation and trading, as far as legally possible, on *co-operative principals*, operating solely for the shared *legitimate interests* of our members, although legally our status is that of a *Limited Company*.

Our principal activity is to operate a,

'wholefood cooperative which promotes locally sourced food for the residents of Suffolk and Ipswich'.

As such, all activity required to operate is done on a voluntary basis, without payment, by and for our members. Members are encouraged to become as 'active' as they wish and role incumbents are not expected to be static. Members can express an interest and elect to carry out a role to support the operation of Ipswich Ripple CIC through Member Meetings (held Quarterly).

See **Annex 1** for roles required and the data access required to carry out the role.

Personal Data held and lawful basis:

For the purposes of Data Protection, Ipswich Ripple CIC and it's active members are **Data Controllers**.

As such, Ipswich Ripple CIC collects and stores the following data:

- Any person wishing to become or renew membership to Ipswich Ripple CIC will be asked to voluntarily provide the following contact information: Name, email address and telephone number.
- It is not essential to the operation of the co-operative to have both of these personal detail fields from all members, however, the company cannot operate without the active assistance and voluntary participation of members to order, accept delivery, check and update prices, accept, process and bank membership payments and purchases, set up and run trading sessions and so on: All the processes required to operate a small retail service. Therefore, we ideally require an email address and at least one other alternative means of contact to be able to contact you about helping, ordering, meetings and membership queries.
- Details are also collected regarding purchases - in order to send out receipts.

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- Personal Data is processed in order to calculate the number of 'helper' sessions each member has carried out, on a rolling year basis, in order to calculate 'active' status and therefore the members entitlement to a price discount.
- Personal order details are submitted by members on a voluntary basis, for the members own legitimate interest, email address is optional to receive notification of the order placed, however contact details are available to members ordering and arranging for delivery in the event of issues with the order and to label the items for the member who placed the order.
- We collect, store and process details of third party companies or individuals from whom we purchase our stock, however details of individual members is not shared to carry out this process. Personal order details remain solely within Ipswich Ripple CIC and it's members to order, to receive and label at sessions, to inform of any supply issues and to generate orders on the till.
- During trading sessions all members who are helping to gain 'active helper' credits (see [Membership Doc v.9](#) for how we have agreed this will occur) will request, or 'look up' on the till, membership numbers when purchase for goods is made. This will enable web/email based receipts to be generated after the session and to bring forward 'active' status (and any price discount due)and personal order reminders.
- How-to documents are available to all members who are volunteering to trade, which detail the processes and reasons that data may be accessible and required by 'helper' members.
(<https://sites.google.com/site/ipswichripple/ripple-documents/how-to-documents>)
- The document drive is password protected, but any paid up member is entitled to view documents of a non-personal nature, by virtue of their membership and shared responsibility ethos.
- We hold personal information collected indirectly:
If you visit our website, we collect only your IP address and the pages you have visited. This is to evaluate the use of and maintain the security of the site.
- In all cases our lawful basis for storing and processing your information is the **Legitimate interest** of Ipswich Ripple CIC and predominantly also that of its individual members to provide and receive the service we have opted to be a part of through our membership.
- We may also record and process limited information regarding Day Members or other interested parties, with a specific purpose. This could be at and after a trading session to send out information on Ripple company information and purpose, membership benefits, trading dates, to make a till note of

individual comments or to request a till receipt be generated, or to respond to contact made to the RippleCIC email address or via the website - but these are all made on a specific and individual request basis only.

- **Annex 2** details privacy statements of other companies/organisations that we use as Data Processors in order to carry out our business in the legitimate interest of our members.
- **Annex 3** shows examples of the documents/ details that are stored or generated in order to record and update membership details.

Data Sharing:

- We only share your information if it is necessary to do so to carry out the business of Ipswich Ripple CIC and its members.
- Ipswich Ripple CIC Directors and all members, whilst carrying out their duties as helper or role holder, do commit to abide by the following statements:
 - All members are entitled to be informed of what information is held about them. A data access request can be made via a till note, or by email or the website form. We reserve the right to ask questions, to endeavour to confirm the recipients identity using the information we do hold, prior to any disclosure.
 - By becoming a Full member (active or inactive) and paying Annual membership fees, you are thereby agreeing that other members in specific roles will also have access to some, or all of the personal data you supplied when joining, or have since updated.
 - In addition, on joining Ipswich Ripple CIC, we do gain a decision from each new member whether they give permission for the data we hold, to be shared with any/all other members on request. This decision is solely at the discretion of the individual member with regards to their own data. Each member is also entitled to change their mind and withdraw permission at any time. However, do note that in a system that operates primarily on trust, once permissibly shared, Ipswich Ripple CIC, its role holders and all members, cannot be held personally responsible for what the recipient chooses to do with your shared data.
- There are specific active 'roles', other than trading day roles, which necessitate access to the Ipswich Ripple Google Mail account. There is also an initial security check, as the *Computer software maintenance and development* role holder has to accept any new device that is used to access it (this is

a Google protection tool). Members should be aware that their emails *could* be read by any of these role-holders: IT/website; Membership; Rota; Treasurer; Cheese & Suma orderers; and Company Secretary. They also have access to the email contact list in order to carry out their roles.

- There is a database maintained by the Membership role holder, in conjunction with the member who provides IT maintenance. Therefore, passwords for access to this, should change as the role-holder changes.
- The IT maintenance/developer should have sole control over setting and changing passwords.
- The Membership role-holder has responsibility for updating the google mail contact email address-list for new members.

Data Storage:

- We use Google Documents and gmail to store all our data, including that held about members. We use password protection for the till-on-the-web (See Annex 3 Image 3 for index page), although there is open access to it for helpers at trading sessions to be able to assist with any member queries and in order to trade.
- We publish our meeting and AGM minutes on the website, but on the members pages.
- The 'till' password is known by many members due to necessity: The index is a link to most forms and information needed to trade , order, cash and for membership and therefore access is required by many members. As incumbents of active roles change with some regularity, logistically it will be impracticable to change the password where there is a personnel change.
- There is no internet access on the 'tills' used at trading sessions: Therefore, data regarding personal orders, stock, membership renewals falling due, 'active' member status and so on, is downloaded onto the 2 Ripple laptop 'tills' from the Google drive, via a portable USB storage drive. This data file should be password protected for transportation. This is prepared by the role holder responsible for updating prices, stock and personal orders received and either they or a nominated active member will ensure the data is copied to the tills.
- The data collected during the sessions regarding purchases, membership, income and till notes, is uploaded back to the till-on-the-web again via a portable USB storage drive. This data file should be password protected for transportation. The password will be to prevent non-members gaining access to the data if the USB drive is mislaid during transportation, therefore, it should be a password that all

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members could be made aware of, as one of those members who have volunteered for 'putting away' at the end of a session will need to carry out this role.

- Access to the Membership spreadsheet (Annex 3, Image 2) is required by the following specific role holders:

Membership role-holder - for adding new member details on; for updating membership payment details, for updating the google mail contacts list and for contacting those whose membership has expired.

Company Secretary - due to their legal role as we are a Community Interest Company.

Rota role-holder - In order to have access to secondary contact details held in the event of urgent difficulties with helper cover for trading days.

Computer software maintenance and development - to ensure that the tills, website and related programmes operate as intended and information is correct.

This spreadsheet, as well as accounting documents, have separate passwords to the till-on-the-web index.

Data Retention:

- Limited Personal Data from the current session may be stored on the till laptops for up to 2 weeks - they are stored in a locked cabinet at the trading venue.
- The information held about individual members can be viewed by contacting us via your recorded email address, or making a personal request for information at a trading session, by requesting the helper adds a 'note' to the till. If you wish to remove your information or not receive emails regarding contact, preferences can be requested and reviewed by emailing RippleCIC, or by requesting a note be added to the till at any trading session.
- Information regarding your membership number, name and membership subscription payment history can be obtained through the till at any trading session. These are available for up to 18 months.
- Personal data should be password protected for transportation on USB data storage devices and removed once uploaded to the till-on-the-web.
- Detailed data regarding individual member purchases (receipts) will be retained for 6 months - in case of member queries or food safety concerns.
- Communication regarding the Wholesale purchases made by Ipswich Ripple CIC members for resale and other items, will be retained in line with Companies House and HMRC guidance and Company Law.

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- Data on lapsed members should be retained for 6 months after renewal was due, then the member contacted to be given the opportunity to remain on the list and return as a full member. Where no response is received, their information will be removed. Where members specifically request to leave, their data does not need to be retained and can be removed with immediate effect should they wish.

Compiled by Member E.Patrick May 2018/ Reviewed at Members' meetings September 2018 & AGM March 2019 and again by Members E.Patrick & F.Loader August 2020, as an outcome of July 2020 Members' Meeting.