

Cwmdu Water Undertaking – GDPR and Data Protection Policy

1. Purpose of this Policy

Cwmdu Water Undertaking (“we”, “our”, “us”) is a UK-registered charity that supplies water to the residents of the village of Cwmdu. This policy sets out how we manage and protect personal data in line with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

2. Scope

This policy applies to all trustees, volunteers, and any third parties processing personal data on behalf of the charity.

3. Our Commitment

We are committed to safeguarding the personal data of residents by ensuring it is:

- Processed lawfully, fairly, and transparently.
- Collected for clear and specific purposes.
- Adequate, relevant, and limited to what is necessary.
- Accurate and kept up to date.
- Retained only for as long as necessary.
- Secured against loss, misuse, or unauthorised access.

4. Legal Basis for Processing

We process personal data under the following lawful bases:

- Contract – to administer the water supply service and collect annual fees.
- Legal Obligation – to meet regulatory and financial reporting requirements.
- Legitimate Interests – to communicate with residents and manage service provision.

5. What Personal Data We Collect

We collect and hold:

- Resident names
- Postal addresses
- Email addresses (where provided)
- Telephone numbers

- Records of payments and charges
- Service correspondence

We do not collect or process special category (sensitive) personal data.

6. How We Use Personal Data

We use personal data to:

- Provide water supply services
- Issue annual fee notices and collect payment
- Maintain the infrastructure and manage service issues
- Comply with accounting and legal obligations
- Communicate with residents as needed

7. Data Storage and Security

All personal data is stored securely within our Microsoft 365 tenant, specifically:

- Word documents and Excel spreadsheets held in secure SharePoint sites
- Access restricted to authorised trustees or administrators
- Microsoft 365 security features (including multi-factor authentication and encryption) are in place

We follow good information governance practices and regularly review access and data accuracy.

8. Data Sharing

We do not share personal data unless:

- Required by law (e.g. for financial or regulatory compliance)
- Necessary for administration (e.g. sharing data with an accountant)

Any third party with access to personal data is required to adhere to equivalent data protection standards.

9. Data Retention

Data is retained only for as long as necessary:

- Resident records: for the duration of residence and up to 6 years after departure
- Financial and payment records: 6 years after the relevant financial year
- Routine correspondence: up to 2 years unless part of an ongoing issue

10. Data Subject Rights

Residents have rights under the UK GDPR, including:

- Right of access to their data
- Right to rectification
- Right to erasure (in certain cases)
- Right to restrict processing
- Right to object to processing
- Right to lodge a complaint with the Information Commissioner's Office (ICO)

Requests should be submitted in writing to the Data Protection Lead.

11. Data Breach Notification

Any personal data breach must be reported to the Data Protection Lead immediately. If the breach poses a risk to individuals' rights or freedoms, the ICO will be notified within 72 hours. Affected individuals will also be informed where necessary.

12. Responsibilities

- The Trustees are responsible for overall data protection compliance.
- The Data Protection Lead oversees day-to-day data handling and breach management.
- All persons with access to personal data must follow this policy.

13. Contact and Complaints

For any data protection-related queries, concerns, or requests, please contact:

Data Protection Officer : Stuart Jones

Email: systems@cwmduwater.org.uk

If you are dissatisfied with our response, you can contact the Information Commissioner's Office at <https://www.ico.org.uk> or by phone at 0303 123 1113.