# **True Food Community Co-operative Privacy Notice**

#### Who are we?

True Food Community Co-operative is a Registered Society under the Co-operative and Community Benefit Societies Act 2014, and is regulated by the Financial Conduct Authority (FCA).

#### We will:

- Only ever ask for what we really need to know
- Collect and use the personal data you share with us transparently, honestly and fairly. Always respect your choices around the data you share with us
- Put appropriate security measures in place to protect the data you share with us
  Never sell your data

#### What we do to ensure your data is secure?

- Train staff, members and volunteers who process data
- Store data securely
- Check third party security

## Who do we share your data with?

This is specified in the attached table.

## **Your Rights**

- You have the right to check what data we have relating to you and in certain circumstances, to restrict how we use it and have it erased.
- We have an obligation to ensure that your data is accurate.
- You have a right to complain about our handling of your data to us or to the Information Commissioners Office at ico.org.uk

If you wish to exercise these rights please contact our Operations Manager who is responsible for our data protection policies and procedures at <a href="mailto:operations@truefood.coop">operations@truefood.coop</a> or 61 Grove Road, Emmer Green, Reading RG4 8LJ.

#### How long do we keep your data?

We will keep your data only as long as we have a legitimate use for it or have a contractual or legal obligation to keep it.

## Changes to this Policy

We keep this policy under review to keep it relevant and up to date. The policy may change from time to time. An up-to-date version will always be available on our website <a href="https://www.truefood.coop">www.truefood.coop</a> and in our shop.

**Reviewed October 2025** 

Members data processing	Data collected	Who accesses the data	Lawful basis	Retention period
Member register	Your name, postal address, email and share holding (£1) is collected from your membership form and is required for our membership records		Legal requirement	Information remains on register even if you stop being a member, with date of leaving
Contact details	We communicate with our members by email but we also hold your phone number for communication at short notice.	Staff, membership admin volunteers and Chair. Stored on 3 rings database and member register.	Legitimate interest	Information remains on register (see above).All information will be removed from 3 rings immediately if you stop being a member.
Your preferred activities	When you join, we ask you what you would like to do as a member of the co-operative. We record this on our 3 Rings database, so that we can enable you to volunteer for those activities, and we can contact you about volunteering opportunites	Lead, staff and members responsible for member	Legitimate interest	All information will be removed from 3 rings immediately if you stop being a member.
Your Emergency contact details	If you volunteer in the shop, we collect contact information on a paper form, to be used only in the event of an emergency.	Shop staff	Legitimate interest	Information deleted if we are notified that you wish to cease volunteering.
Customer data processing	Data collected	Who accesses the data	Lawful basis	Retention period
Special orders	We collect your name, email address and phone number so that we can let you know that your order is ready or to clarify any details with you. We generally only use email to do this, but take a number as back up in case there is a problem with the email address.	Shop staff & volunteers	Legitimate interest	Order form destroyed once the order is collected. We regularly remove email addresses, which we no longer need, from our systems.
All store visitors / staff	Data collected	Who accesses the data	Lawful basis	Retention period
Store security - CCTV monitoring	Images of any staff, volunteers, members and general shoppers including children who are in the store	Operations Manager, selected staff and selected members	Legitimate interest	Images are wiped every 90 days
Accidents	Record of any accidents with details of incident and remedial action	Operations Manager	Legal requirement	3 years from the date of the incident
Suppliers	Data collected	Who accesses the data	Lawful basis	Retention period
Supplier data processing	Name, address, email, bank account details	Shop staff	Legal requirement	6 years after invoice payment
Employment data processing	Data collected	Who accesses the data	Lawful basis	Retention period
Recruitment application	Name, gender, email address, postal address, telephone numbers, work and education history, as well as the name, telephone, mobile numbers and/or email address of any referee(s) (which we will only use for the purpose of obtaining a reference).	Interview panel members	Legal requirement	1 year after date of rejection letter, if application unsuccessful. Information added to employment record if successful.
Employment	Details relating to your employment, service or position with us, including contracts, proposed changes, new arrangements and termination.	Designated committee members and Finance Manager	Legal requirement	6 years after the date of leaving
Identification/Right to work details		Designated committee members	Legal requirement	6 years after the date of leaving
Payroll & benefits		Finance manager, Treasurer, HMRC, Pension provider	Legal requirement	6 years after the date of leaving
Leave & health	This may include details of (i) your attendance, holiday, sickness or other leave of absence and (ii) your health including self-certification forms, fit notes, medical and occupational health tests and reports and conclusions related to fitness for performance for work.	Designated committee members and Finance manager	Legal requirement	6 months after the date of leaving
Work information		Designated committee members, Finance manager, operations manager	Legitimate interest	6 months after the date of leaving
Grievance and discipline	Any disciplinary, grievance, allegations, investigation and similar which you may be directly or indirectly involved in (whether or not at fault) and interactions with law enforcement and any criminal investigations where applicable	Designated committee members, Co ops UK HR team	Legal requirement	6 months after the date of leaving
Emergency contacts	We may also require you to provide from time to time, certain personal information of other individuals such as your next of kin, family members, emergency contacts or beneficiaries	Committee members & staff	Legitimate interest	6 months after the date of leaving
Other	Data collected	Who accesses the data	Lawful basis	Retention period
Work Experience students	Name, address, email, name of school, parental consent including parent's name and address, emergency contact details	Staff	Legitimate interest	Information is retained indefinitely other than emergency contact details which are deleted once you complete your work