



Ickleton Community Pub Limited Limited

Privacy Policy

Ickleton Community Pub Ltd ("the Society") is a Community Benefit Society registered under the Co-operative and Community Benefit Societies Act 2014. We are governed by rules based on the Plunkett Foundation's Model Rules and registered with the Financial Conduct Authority (FCA).

We are committed to protecting the privacy and security of the personal data we hold, in compliance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. This policy explains what data we collect, why we collect it, how we use it, and your rights. Our Data Protection Lead is Eric Burrows, Chair of the Management Committee, and the Society is registered with the Information Commissioner's Office (ICO).

Categories of Personal Data We Process

Members and Shareholders

As part of our legal obligations, we maintain a register of members and directors at our registered office (April Cottage, Butchers Hill, Ickleton, CB10 1SR). This register includes each member's name, postal and email addresses, the number and value of shares held, any loans or other property held with the Society, dates of joining and leaving membership, nominated beneficiaries, and whether the member is a UK resident for tax purposes.

We may also hold additional information such as date of birth, bank details for payments, interest accrued or paid, eligibility for investment tax relief, and details of the share offer invested in. We use members' contact details to provide legally required information, including notices for Annual and Extraordinary General Meetings, annual reports, and accounts. With consent or where we have a legitimate interest, we may also update members on Society news, events, fundraising, or further investment opportunities.

Committee Members

We collect and process the names, contact details, and dates of birth of committee members to comply with legal requirements, maintain effective communication, and support the administration of the Society. The lawful basis for processing this information is consent and legal compliance.

Employees, Job Applicants, and Volunteers

For employees, job applicants, and volunteers, we process personal data necessary to meet legal obligations, manage employment relationships, and support our operations. This includes contact details, date of birth, emergency contacts, recruitment information (CVs,

application forms, interview notes), employment records (contracts, roles, pay, pension, training, performance, disciplinary matters), payroll information (bank details, NI numbers, tax codes), right-to-work documentation, and records of absence or sickness.

Bookings

We collect personal data when you make a booking at the pub, including your name, contact details (email address and/or phone number), number of guests, date and time of your booking, and any special requirements (e.g., dietary needs or accessibility requests). Bookings may be made by phone, email, or through any online booking system we use. The lawful basis for processing this information is to fulfil our contract with you and for our legitimate interest in managing bookings efficiently and providing a safe and enjoyable experience. Your booking data is shared only with relevant staff necessary to manage and honour your booking. We retain booking information only for as long as necessary to manage your booking and handle any related queries or safety issues, after which it is securely deleted.

Suppliers and contractors

We may collect names, contact details, and other relevant information from suppliers or contractors in order to communicate and manage the purchase of goods or services. The lawful basis for processing this information is contract or legitimate interest.

Mailing List Subscribers

For those who opt in to receive newsletters via EmailOctopus, we collect only name and email address. EmailOctopus acts as our data processor, storing data securely. You may unsubscribe at any time via the link in any newsletter or by contacting us directly.

CCTV Recordings

We operate CCTV in certain areas of the premises for security, crime prevention, and safety. This is managed in accordance with our separate CCTV Policy, which is available on request or via our website. Signage is displayed to inform visitors that CCTV is in use, and recordings are accessed only by authorised personnel.

Website and IT Systems

Our website uses cookies and third-party services such as Google Analytics. Visitors can manage or block cookies via their browser settings. No personally identifiable information is collected without consent.

External websites linked from our site are not covered by this Privacy Policy.

Lawful Bases for Processing

We process personal data on one or more of the following lawful bases:

- **Legal obligation:** to comply with laws, including maintaining the membership register, employment law, and tax obligations
- **Contract:** to perform contracts, such as employment agreements
- **Legitimate interest:** for the running and security of the Society, including CCTV use
- **Consent:** for optional communications, such as newsletters to non-members

Data Sharing

We do not sell personal data. We may share information only where necessary, including with HMRC, pension providers, payroll processors, EmailOctopus for newsletters, the FCA for statutory filings, and law enforcement, insurers, or legal advisers where required. Our IT and systems providers may also access personal data solely to support operations.

Data Retention and Security

We keep personal data only for as long as necessary:

- **Members:** while membership is active, plus six years after membership ends
- **Employees:** six years after employment ends (payroll records may be retained longer if required by law)
- **Job applicants (unsuccessful):** six months
- **Mailing list subscribers:** until you unsubscribe
- **CCTV recordings:** 30 days unless required for an investigation (see CCTV Policy)

We avoid keeping paper records wherever possible, preferring to scan and securely shred documents once digital copies are stored. Where physical records are necessary, they are handled carefully to prevent unauthorised access. Electronic records are password-protected with restricted access, and CCTV footage is stored securely in accordance with our CCTV policy.

Your Rights

We are committed to giving you clear control over your personal information. You have the right to request a copy of the personal data we hold about you, have inaccurate data corrected, and, in certain circumstances, request erasure or restriction of processing, or object to how we process your data. For any optional communications you have consented to, you may withdraw consent at any time. If you feel your rights have not been respected, you can raise a complaint with the Information Commissioner's Office (ICO) at www.ico.org.uk.

Policy Updates

We may update this Privacy Policy from time to time. Any material changes to how we collect, use, or share personal information will be communicated via notices on our website or at the pub.

Contact for Data Protection

To exercise your rights or raise any concerns, contact:

Eric Burrows – Data Protection Lead

Ickleton Community Pub Ltd

April Cottage, Butchers Hill, Ickleton, CB10 1SR

Email: chair@icplimited.org.uk

Document History

June 2024	Policy approved by ICP Management Committee
August 2025	Policy updated to reflect operational changes following pub opening