



Gressenhall Community Enterprise Data Protection and Privacy Policy

Gressenhall Community Enterprise Limited (Company No. RS008157) ("Gressenhall Community Enterprise", "we") is committed to safeguarding your privacy. At all times we aim to respect any personal information you share with us, or that we receive from other organisations, and keep it safe. This Privacy Notice ("Notice") sets out our data collection and processing practices and your options regarding the ways in which your personal information is used, when you provide your information for the purpose of becoming/being a member of the Gressenhall Community Enterprise.

This Notice contains important information about your personal rights to privacy. Please read it carefully to understand how we use your personal information. We may update this Notice from time to time and will notify you accordingly.

It is important to note that The White Swan Gressenhall, which we own and are closely associated with, have delegated the day-to-day management and operation of the pub to a separate organisation via a Management Agreement. As such we do not hold booking enquiries from customers/prospective customers, supplier or staff details. These fall under the remit of the Management Operator. The operator also processes and handles CCTV data on our behalf which we have no direct access to - as such we hold an exemption from the Information Commissioners Office and do not need to hold a data protection fee license with them.

If your enquiry is in any way associated with data arising from the pub operation - please contact pub@thewhiteswangressenhall.com in the first instance. This also applies to The White Swan Gressenhall's Facebook and Instagram pages.

Consent

The provision of your personal information to us is voluntary. However, without providing us with the personal information requested in the application form, we are unable to process shareholder applications.

1. How we collect personal information

Personal information is collected in a variety of ways in order for us to fulfil our role as a membership organisation, including:

- Email correspondence with members, prospective members, individuals from the local community, local media, local businesses, suppliers, contractors, managing agents, tenant(s) [who occupy the upstairs flat] and other miscellaneous parties with an interest.
- Written forms associated with special events, future share offers or other member resolutions.



2. What personal information do we collect and use?

MEMBERS ONLY:

For the purposes of the application process and your continued status as a shareholder/member of the community enterprise, we collect and store the following types of personal information:

- Your name
- Your date of birth
- Financial details (for both receiving and sending funds)
- The size of your shareholding and amount paid/considered as paid on the shares
- The date on which you entered on Gressenhall Community Enterprise's Society share register
- The date on which you cease to be a member of Gressenhall Community Enterprise as recorded on our Society share register
- Your contact information (telephone number, physical address, and email address)

MEMBERS and NON-MEMBERS:

- Your contact information (telephone number, physical address, and email address) and nature of enquiry / details contained within

3. How and why we will use your personal information

As a member of Gressenhall Community Enterprise your data will be used for;

- Processing your membership and shares in Gressenhall Community Enterprise
- For our internal administrative and management operation, such as record-keeping and statistical research
- Communicating non-marketing materials to you about your shareholding in Gressenhall Community Enterprise
- Initial registration of you within our organisation
- Payment of any member dividends commensurate with shareholding
- To satisfy legal obligations which are binding on us
- Prevention of fraud, misuse of services or money laundering
- To establish, defend and/or enforce legal claims

As a non-member of Gressenhall Community Enterprise your data will be used for;

- Marketing purposes for relevant information
- Promotion of non-marketing materials about the progress of projects associated with Gressenhall Community Enterprise



4. Securing of and access to your personal information

We endeavour to ensure that there are appropriate and proportionate technical and organisational measures to prevent the loss, destruction, misuse, alteration, unauthorised disclosure of or access to personal information.

In particular, your personal information will only be accessible by appropriately trained committee members or trusted partners and will be stored within a computerised database protected by anti-virus software and secure password access.

Apart from this, the personal information we collect for the purposes of your membership will not be disclosed to any third party, unless we are required to do so due to any legal or regulatory obligation.

In general, the information that we collect from you will be stored at a destination within the UK or European Economic Area. Please note we cannot guarantee the security of personal information transmitted via the internet.

Lawful Processing

The General Data Protection Regulation (EU) 2016/679 ("GDPR") requires us to rely on one or more lawful grounds to process your personal information. For the purposes of this application, we consider the grounds listed below to be relevant:

(1) Where necessary for the performance of a contract to which you are a party or to take steps at your request prior to entering a contract.

So that we can provide you with the allotted shares in Gressenhall Community Enterprise in return for the share purchase price.

(2) Where necessary so that we can comply with a legal obligation to which we are subject.

For example, for anti-money laundering, accounting or auditing purposes (for example our annual return to the FCA), FCA inspections or so that we can register you on our internal register.

(3) Where there is a legitimate interest in us doing so.

The GDPR allows us to collect and process personal information if it is reasonably necessary to achieve our legitimate interests (as long as that processing is fair and balanced and does not unduly impact your rights).

In general, "legitimate interests" mean the interests of running Gressenhall Community Enterprise as a community benefit society. Where we process your personal information to achieve such legitimate interests, we consider and balance any potential impact on you (both positive and negative), and your rights under applicable data protection/privacy laws. We will not use your personal information for activities where our interests are overridden by the impact on you, for example where use would be excessively intrusive (unless, for instance, we are otherwise required or permitted to by applicable law).



6. Your Rights

Once we have collected and as long as we continue to process your personal information, you have the following rights:

- **Right of access** – you can write to us to ask for confirmation of what personal information we hold on you and to request a copy of that information, provided we are satisfied that you are entitled to see the information requested and have successfully confirmed your identity.
- **Right of erasure** – you can ask us to delete your personal information in certain circumstances.
- **Right of rectification** – if you believe that our records of your personal information are inaccurate, you have the right to ask for those records to be updated.
- **Right to restrict processing** – you have the right to ask for processing of your personal information to be restricted if there is disagreement about its accuracy or legitimate usage.
- **Right to object** – you have the right to object to our processing of your personal information in certain circumstances including where we use it for direct marketing.
- **Right to data portability** – where we are processing your personal information (i) with your consent or (ii) because such processing is necessary for the performance of a contract, you may ask us to provide the personal information to you – or another service provider – in a machine-readable format.

To exercise any of these rights, please send a description of the personal information in question using the contact details in section 9 below. Where we consider that the information you provide does not enable us to identify you or the personal information in question, we reserve the right to ask for (i) personal identification or (ii) further information.

Please note that you may only use/benefit from some of these rights in limited circumstances. For more information, we suggest that you consult guidance from the [Information Commissioner's Office \("ICO"\)](#) – or please contact us using the details in section 9 below.

You also have the right to make a complaint to the ICO about us or the way we have processed your personal information. For further information on how to exercise this right, please see the guidance at <https://ico.org.uk/for-the-public/personal-information>. The contact details for the ICO can be found [here](#).

7. How long do we keep your personal information?

In general, unless still required in connection with the purpose(s) for which it was collected and/or is processed (i.e. to allow you to be a shareholder/member in Gressenhall Community Enterprise or for associated record-keeping obligations), we remove your personal information from our records six years after the date it was collected. However, if before that date (i) your personal information is no longer required in connection with such purpose(s), (ii) we are no longer lawfully entitled to process it or (iii) you validly exercise your right of erasure, we will remove it from our records at the relevant time.



8. Changes to this Notice and Your Personal Information

We keep this Notice under regular review and may update it from time to time. Where necessary we will notify you of changes to the Notice by email. The Notice was last updated on April 13, 2026.

You can check the personal information we hold about you, and ask us to update it where necessary, by emailing communitypubgressenhall@gmail.com.

9. How to contact Gressenhall Community Enterprise

We are a Community Benefit Society registered in England and Wales. Our registered office is at **Hall Farm, Church Lane, Gressenhall, Dereham, NR19 2QF**.

Please let us know if you have any questions or concerns about this Notice or the way in which your personal information is processed by contacting us at the following channels:

Email: communitypubgressenhall@gmail.com

By Post: Hall Farm, Church Lane, Gressenhall, Dereham, NR19 2QF