

BOARD AND COMMITTEE MEMBERS PRIVACY STATEMENT

Islington & Shoreditch Housing Association Limited

This statement explains how Islington and Shoreditch Housing Association Limited (ISHA) handles and uses personal data we collect about Board Members and Committee members. When we say “we” or “us” we are referring to ISHA and where we refer to “you” or “your” we are referring to our Board Members and Committee Members. We are registered with the Information Commissioner’s Office (ICO) with the following reference numbers: ISHA Z8174976.

1. Your personal data – what is it?

Personal data means any information which relates to you or identifies you as an individual.

2. What type of personal information do we collect?

We collect a range of information about you. This includes:

- Your name, address and contact details, including e-mail addresses, telephone numbers, and biographical information (including date of birth)
- Details of your qualifications, skills, experience and employment history, including start and end dates
- Photographs of you
- Your attendance at events
- Personal data provided by you for a specific purpose or purposes (for example disability or catering preferences)
- Photo ID
- National insurance number and details of your bank account for remuneration and expense payments
- Details of other trustee, board member and company involvement
- Meetings attended
- Contributions made at meetings, as recorded in minutes
- Training records
- Appraisal records
- Equal opportunities monitoring information including special categories of data information about your ethnic origin, sexual orientation, religion or belief.

This is mainly information you provided when applying to be a Board or Committee member supplemented by information generated in the course of your appointment. We may collect this information in a variety of ways. This could be from CVs or forms completed by you at the start of or during your appointment, or from correspondence with you.

We may also collect personal information about you from third parties. This includes references.

Your data will be stored in a range of different places including on your personal folder in our HR system, finance systems and on other IT systems (including our e-mail system and the door entry system).

3. How do we use your personal data?

ISHA collects and processes personal data relating to its board and committee members to ensure good governance. We are committed to doing so transparently and fairly and to treat your information with the utmost care and confidentiality to meet our data protection obligations.

ISHA complies with its obligations under Data Protection legislation by keeping personal information up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal information from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal information.

4. What is the legal basis for processing your personal data?

We need to process data to fulfil legal requirements of company law, Co-operative and Community Benefit Societies legislation and health and safety laws.

In other cases, we have a legitimate interest in processing personal data before during and after the end of the board/committee relationship. This could include, for example, board effectiveness reviews or reports to the Regulator of Social Housing,

5. How we use your data

- Publications, invitations and other communications
- E-mails
- Internal reporting and record-keeping
- Administrative purposes e.g. booking training, processing expenses
- Giving entry card access to Blackstock Road
- Marketing, including images online, in print and on social media with your consent
- Minutes of meetings
- Annual accounts
- Reporting to the Financial Conduct Authority and Companies House
- Reporting to the Regulator of Social Housing

We process special categories of data such as information about ethnic origin, sexual orientation or religion or belief. This is done for the purposes of equal opportunities monitoring. Data that we use for these purposes is collected with the express consent of board members which can be withdrawn at any time. Board members are entirely free to decide whether or not to provide such data and there are no consequences of failing to do so.

6. Sharing your personal data

Your information may be shared internally. This includes members of staff if access to the data is necessary for the performance on their role.

We may also share your data with third parties such as consultants engaged for board related projects or to check against the Register of Disqualified Directors maintained by [Companies House](#) and the [insolvency register](#).

We may undertake the transfer of your personal data to countries outside of the United Kingdom, for example when a processor holds their data in the EU. When doing this, we ensure we comply with the UK GDPR's rules around international transfers.

7. How do we keep your information safe?

We understand the importance of security of your personal information and take appropriate steps to safeguard it. We have internal policies and controls in place to make sure that your data is not lost, accidentally destroyed, misused or disclosed and is not accessed except by our employees in the proper performance of their duties. All staff who have access to your data are trained in how to use your information in a secure and sensitive way. All hard copy personal details are kept in locked cabinets when not in use. Information on e-mails sent externally are encrypted or password protected and information in databases is password protected. We regularly review our IT provision to make ensure security and that it is fit for purpose.

Where we engage third parties to process data on our behalf, we do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

8. How long do we keep your personal data?

We will hold your personal data for the duration of your appointment and for 6 years after board membership ceases though some details will be destroyed when membership ceases e.g. bank details.

We are required to keep many board records permanently such as minutes of meetings and resolutions.

9. Your rights and your personal data

Unless subject to an exemption under data protection legislation, you have the following rights with respect to your personal data:

- The right to request a copy of your personal data which we hold about you;

- The right to request that we correct any personal data if it is found to be incorrect or incomplete;
- The right to transfer personal data from our electronic processing system to another organisation's electronic processing system;
- Require us to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- Object to the processing of your data where we are relying on our legitimate interests as the legal ground for processing;
- Where we rely on your consent as your legal basis to process your personal data, you have the right to withdraw your consent and ask for your data to be deleted or restrict/object to some elements of the processing. As we explain above, we will not rely on consent in many cases;
- The right to raise a data protection complaint with us about how we handle your personal data; and
- If you are not satisfied with our response to your data protection complaint, the right to lodge a complaint with the Information Commissioner's Office (ICO).

10. Erasure (Your Right to be Forgotten)

You have the right to ask us to delete personal information we hold about you. You can do this where:

- The information is no longer necessary in relation to the purpose for which we originally collected/processed it
- You withdraw consent
- You object to the processing and there is no overriding legitimate interest for us continuing the processing
- We unlawfully processed the information
- The personal information has to be erased in order to comply with a legal obligation

We can refuse to erase your personal information where the personal information is processed for the following reasons:

- Where we have an overriding legitimate interest for continuing with the processing
- To exercise the right of freedom of expression and information
- To enable functions designed to protect the public to be achieved eg government or regulatory functions
- To comply with a legal obligation or for the performance of a public interest task or exercise of official authority
- For public health purposes in the public interest
- Archiving purposes in the public interest, scientific research historical research or statistical purposes
- The exercise or defence of legal claims

11. Further processing

If we wish to use your personal data for a new purpose, not covered by this Privacy Statement, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

12. What if you do not provide personal data?

You have some obligations under company law to provide us with data. Certain information such as contact details and fit and proper person declaration have to be provided so that we can enter into an agreement with you. If you do not provide other information, this will hinder our ability to operate legally under company law.

13. Automated decision making

We do not use any automated decision-making in relation to Board and Committee members.

14. Who do you contact about your personal data?

To exercise your data protection rights, raise a concern, or make a data protection complaint, please contact ISHA in the first instance at:

Email: dataprotection@isha.co.uk

Telephone: 0300 131 7300

15. How can you escalate a data protection complaint?

If you have already raised a data protection complaint with us and are not happy with our final response (or how we have handled your data), you have the right to lodge a complaint with the Information Commissioner's Office (ICO) on:

Telephone: 0303 123 1113

Via their website: <https://ico.org.uk/make-a-complaint/>

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