



New Galloway Community Enterprises Ltd Shareholders Privacy Statement May 2018

New Galloway Community Enterprises (NGCE) recognises that it stores and processes personal data during the course of its operation. Our Shareholders have a right to privacy and to expect that all personal information about them will be handled sensitively and confidentially. NGCE also has a legal responsibility under the General Data Protection Regulations (GDPR) that came into force in May 2018 to keep this data secure and private.

NGCE has undertaken an audit of all the personal data that it keeps and has created a Data Protection Policy. This statement summarises that Policy as it relates to our Shareholders.

Personal Data

NGCE holds data on its Shareholders that may include:

- Name
- Address
- Email address
- Phone numbers
- Membership number
- Value of shareholding.

Basis

- The above Data is held on the legal basis of **Legal Obligation**, since the storage and processing is a requirement of our registration with the Financial Conduct Authority.

Use

- The above data is used for the purpose of NGCE Ltd's administration of its Share issue.
- It is also used to facilitate targeted communication regarding the governance and the operations of NGCE Ltd.

Sharing

- The above data is kept confidential to the Board members of NGCE Ltd.
- As per our Constitution and registration conditions, the Names of Shareholders can be requested a matter of public knowledge but contact details and the value of shareholdings cannot be requested.

- Aside from requests of this nature, the above data will never be shared with third parties unless NGCE is legally required to do so.

Storage

- Your personal data will be held securely and only those persons who have a legitimate right to access it will be able to do so. Paper copies are held in locked files and electronic data on password protected computers and a GDPR compliant system with appropriate permissions in place.

Your Rights

- You have the right to be informed of the Personal Data held by NGCE Ltd on you and to be assured that the information is correct.
- You have the right to access this information and to have errors corrected. If you wish to access the information, please request a Subject Access Request form, or download it from www.newgallowaycommunity.shop.

Reviewed and accepted by the Board of NGCE Ltd on 24 May 2018