WEELA Privacy and Data Protection Policy

DRAFT FOR REVIEW - VERSION 1.1
Last updated: 25 October 2026

1. Introduction

WEELA is a leaseholders' association representing leaseholders within the Worlds End Estate.

In carrying out its activities, WEELA collects and uses certain personal information about Leaseholders, Members, applicants, Committee members, representatives and, in some circumstances, other people connected with properties on the Worlds End Estate.

WEELA is committed to protecting personal information and handling it fairly, responsibly and in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and other applicable data protection legislation.

For the purposes of data protection law, WEELA is the **data controller** for the personal information described in this policy.

The Committee has overall responsibility for compliance with this policy. The Secretary has day-to-day responsibility for maintaining WEELA's registration, membership and governance records, subject to any delegation properly made by the Committee.

Questions about the use of personal information by WEELA may be sent to:

Email: info@weela.org.uk

2. Personal information we hold

WEELA may hold the following information.

Registration, membership and contact information

This may include:

- the address and unique registration number of a Registered Leasehold;
- the name of the Leaseholder or Leaseholders, including the legal name of a company, body corporate or other legal entity where applicable;
- the name, membership category and associated Registered Leasehold or Registered Leaseholds of a Member;
- the identity and status of a Voting Representative, Alternative Member or Corporate Representative where applicable;
- a correspondence or home address, if different;
- email addresses;
- telephone numbers;
- WhatsApp or similar contact details;
- preferred methods of communication; and
- other contact information voluntarily supplied to WEELA.

Registration and membership administration

WEELA may keep records relating to:

- applications to register Qualifying Leaseholds and the resulting registration status;
- applications, confirmations and changes relating to membership;

- reasonable evidence of ownership, identity or authority where required to verify registration, membership or representation;
- designation, replacement or removal of Voting Representatives, Alternative Members and Corporate Representatives;
- nominations for membership of the Committee or other WEELA positions;
- service on the Committee or Sub-Committees;
- attendance or representation at meetings;
- votes and ballot records where reasonably necessary to administer or verify a meeting, election, ballot or resolution;
- correspondence concerning registration or membership; and
- other information reasonably required for the administration and governance of WEELA.

Information about properties and occupants

Where relevant to WEELA's activities, records may contain information concerning a leaseholder's property.

For example, where a flat is rented to tenants, WEELA may record the names and contact details of tenants or other occupants where this has been supplied to WEELA and there is a legitimate reason for WEELA to hold that information.

WEELA will not use information about tenants or occupants for purposes unrelated to the legitimate activities of the Association.

Notes and correspondence

WEELA may maintain notes concerning its dealings with Members, Leaseholders and other people where these are relevant to the administration or activities of the Association.

WEELA also operates email accounts. These accounts may contain:

- emails sent to or received from Leaseholders, Members and other people;
- correspondence with RBKC and other organisations;
- documents or photographs supplied to WEELA;
- registration or membership applications;
- enquiries or complaints; and
- other material connected with WEELA’s activities.

Meetings and minutes

WEELA will maintain records of relevant meetings, including minutes.

Minutes may record:

- the names of people attending or represented at a meeting;
- apologies for absence;
- Committee membership;
- proposals and decisions;
- the identity of people proposing or seconding motions; and
- where relevant to an accurate record of the meeting, the identity of people making particular comments or representations.

Approved minutes will be available for reasonable inspection by Members in accordance with the Constitution and, where appropriate, may also be published on the WEELA website.

WEELA will seek to avoid including unnecessary personal information in published minutes and may redact confidential or personal information where appropriate.

Where personal or confidential information is to be considered at a Committee meeting, access to that part of the meeting may be restricted in accordance with the Constitution.

3. Why we use personal information

WEELA uses personal information solely where reasonably necessary for the activities and administration of the Association and for representing the interests of leaseholders.

This includes:

- registering Qualifying Leaseholds and maintaining an accurate Register of Registered Leaseholds;
- administering membership and maintaining an accurate Register of Members;
- verifying eligibility for registration and membership and verifying ownership, authority or nomination where reasonably required;
- recording and administering Voting Representatives, Alternative Members and Corporate Representatives;
- communicating with Leaseholders and Members;
- organising meetings;
- conducting and verifying elections, nominations, ballots and votes;
- maintaining Committee and governance records;
- recording decisions made at meetings;
- responding to enquiries from Members or Leaseholders;
- dealing with issues affecting leaseholders or the Worlds End Estate;
- communicating with the Royal Borough of Kensington and Chelsea (RBKC);
- representing the interests of leaseholders to RBKC;
- establishing and maintaining WEELA's recognition by RBKC as a representative leaseholders' organisation;
- demonstrating that WEELA has the required level or proportion of registered qualifying leasehold properties or qualifying leaseholders for that recognition; and
- complying with applicable recognition arrangements, including providing appropriate governance information where required.

WEELA will not use personal information for unrelated commercial purposes or sell personal information to third parties.

4. Our lawful basis for using personal information

WEELA's principal lawful basis for processing personal information is its legitimate interests.

Those legitimate interests are:

- operating and administering a leaseholders' association;
- maintaining appropriate records of registered leasehold properties, membership and governance;
- communicating with Leaseholders and Members;
- administering meetings, elections and voting arrangements;
- representing the interests of leaseholders;
- communicating with RBKC about matters affecting leaseholders and the Worlds End Estate; and
- obtaining, maintaining and complying with recognition by RBKC as a representative leaseholders' organisation.

WEELA considers that Leaseholders who register a property with the Association, and people who become or act as Members or representatives, would reasonably expect their information to be used for these purposes.

Where another lawful basis is more appropriate, WEELA may rely upon that basis, including compliance with a legal obligation or consent where consent is specifically required.

5. Sensitive or special category information

WEELA does not normally require Members or Leaseholders to provide sensitive personal information, such as information concerning health, racial or ethnic origin, religion, political opinions or sexual orientation.

Such information may nevertheless occasionally be contained in correspondence, documents or comments voluntarily supplied to WEELA.

WEELA will not deliberately collect or record this type of information unless there is a genuine need to do so. Where WEELA needs to process special category personal information, it will only do so where there is an appropriate lawful basis and an applicable condition under data protection law.

6. Sharing information with RBKC

WEELA may provide personal information to the Royal Borough of Kensington and Chelsea (RBKC) where this is reasonably necessary to obtain or maintain WEELA's recognition as a representative leaseholders' organisation or to comply with applicable recognition arrangements.

This may, for example, involve providing information necessary to demonstrate:

- the identity of WEELA Members or Leaseholders;
- that relevant properties or people meet the applicable eligibility requirements;
- that WEELA has the required proportion or number of qualifying registered properties or qualifying leaseholders; and
- appropriate Committee details, approved minutes, reports or other governance information where required under the applicable recognition arrangements.

WEELA will seek to provide RBKC with only the information reasonably necessary for these purposes.

Information supplied to RBKC will not include unrelated notes, correspondence or other personal information held by WEELA unless there is a separate lawful reason for doing so.

7. Other disclosure of personal information

Except as described above, WEELA does not routinely disclose Members' or Leaseholders' personal information to third parties.

WEELA may nevertheless disclose information where:

- it is required to do so by law;
- disclosure is necessary in connection with legal proceedings;
- it is necessary to protect the rights or interests of WEELA or its Members; or
- the person concerned has specifically authorised the disclosure.

WEELA uses third-party services to operate its IT systems, such as website hosting, email services, data storage and backup facilities.

Those organisations may technically process personal information on WEELA's behalf in providing those services. They are not permitted to use WEELA's information for their own unrelated purposes and, where required, WEELA will ensure that appropriate data-processing arrangements are in place.

8. Information concerning other people

A Leaseholder or Member may occasionally provide WEELA with information concerning another person, for example the name or contact details of a tenant occupying their property.

WEELA will only retain and use such information where it is relevant to WEELA's legitimate activities and will provide appropriate privacy information to the person concerned where required by law.

Members and Leaseholders should avoid providing WEELA with personal information about other people unless there is a reasonable need for WEELA to have that information.

9. Accuracy of information

WEELA will take reasonable steps to ensure that personal information is accurate and kept up to date.

Leaseholders and Members are encouraged to tell WEELA if their contact details, ownership, representative status or other relevant information change.

10. How long we keep information

WEELA will retain personal information for no longer than is reasonably necessary for the purpose for which it was collected.

Different types of information may be retained for different periods.

In particular:

- current registration, membership and contact information will normally be retained for as long as the property remains registered or the individual remains a Member or representative, as applicable;
- historical entries in the Register of Registered Leaseholds and Register of Members may be retained where reasonably necessary to preserve an accurate record of WEELA’s registration, membership, elections, decisions and governance;
- former membership and representative records may be retained for a reasonable period where needed to maintain an accurate history of the Association or deal with subsequent enquiries;
- correspondence and supporting documents will be periodically reviewed and deleted when they are no longer reasonably required;
- unsuccessful or withdrawn applications and nominations will not be retained indefinitely unless there is a legitimate reason to retain them;
- temporary voting verification records will be reviewed and deleted when they are no longer reasonably required, while formal election and ballot results may form part of the permanent governance record; and
- formal minutes, constitutional records, election results and other records forming part of the permanent history and governance of WEELA may be retained indefinitely.

WEELA will periodically review the personal information it holds and delete information which is no longer reasonably required.

11. Security

WEELA will take reasonable technical and organisational measures to protect personal information against:

- unauthorised access;
- accidental disclosure;
- loss;
- destruction; or

- alteration.

Access to electronic records containing personal information will be limited to those WEELA Committee members, officers or other authorised people who reasonably require access in order to carry out their responsibilities.

Accounts and systems holding personal information will, where reasonably practicable, be protected using appropriate passwords, access controls and multi-factor authentication.

12. Data hosting and location

WEELA's electronic records are hosted using Microsoft cloud services.

The WEELA website and associated data are hosted in the Microsoft Azure UK South region. Backups of data held on the server are made using standard Microsoft Azure backup facilities configured for UK-hosted services.

WEELA's email service is provided using Microsoft 365 and Exchange Online. WEELA's Microsoft 365 tenant is configured for the United Kingdom.

Accordingly, WEELA intends that its principal electronic records, website data, backups and email data are stored within Microsoft data centres in the United Kingdom.

Microsoft and other service providers may nevertheless process limited service, diagnostic, security or administrative information outside the United Kingdom as part of operating their global services. Where any transfer of personal information outside the United Kingdom takes place, WEELA relies on the safeguards and contractual arrangements provided by the relevant service provider in accordance with UK data protection law.

13. Individuals' data protection rights

Depending upon the circumstances and the legal basis on which information is being processed, individuals may have the right to:

- ask WEELA what personal information it holds about them and obtain a copy of it;
- ask WEELA to correct inaccurate or incomplete information;
- ask WEELA to delete personal information where there is no longer a lawful reason to retain it;
- ask WEELA to restrict the use of their information in certain circumstances; and
- object to processing based upon WEELA’s legitimate interests.

These rights are not absolute and in some circumstances WEELA may be entitled or required to continue to retain or process information.

Requests concerning personal information should be sent to:

info@weela.org.uk

WEELA will respond to requests in accordance with applicable data protection legislation.

14. Automated decision-making

WEELA does not use personal information for automated decision-making or profiling.

15. Complaints

Anyone who is concerned about the way WEELA has handled their personal information should contact WEELA in the first instance at:

info@weela.org.uk

WEELA will try to resolve any concern promptly.

Individuals also have the right to complain to the Information Commissioner's Office (ICO), the UK's data protection regulator.

Information about making a complaint is available from the ICO at www.ico.org.uk.

16. Changes to this policy

WEELA may update this policy from time to time, particularly if its activities, constitutional arrangements or the way in which it handles personal information change.

The current version will be made available on the WEELA website at www.weela.org.uk.

WEELA

Worlds End Estate Leaseholders Association

www.weela.org.uk

info@weela.org.uk