

MARTON AND NORMANBY VILLAGE HALL

DATA PROTECTION POLICY

Being transparent and providing accessible information to individuals about how we use personal data is a key element of the Data Protection Act 1998. Marton and Normanby Village Hall Committee is committed to protecting and respecting the privacy of personal data.

Being a small, not for profit, charity we do not have a statutory requirement to register with the Information Commissioner's Office or to have a named Data Protection Officer. If you have any questions regarding your personal data please contact martonandnormanbyvillagehall@g.mail.com

Data we process:

1. Booking Data.

This is the name, address, telephone number and email address as supplied by the prospective hirer via the booking form. It is used to ensure effective communication throughout the booking process, from initial request to banking of payment. The lawful basis for processing this data is that we are entering into a contract with the hirer for the hire of the hall.

2. Trustee Data

This is the name, address, telephone, email address and date of birth of trustees. We are required by law to notify the Charity Commission of these details. It may also be necessary for effective communication between trustees. The lawful basis for processing this data is therefore the Legal Obligation with the Charity Commission and the need for effective communication between trustees.

3. Email

This is an email address only for contacting the Committee. The Secretary also keeps a list of Committee members email addresses to notify members of meetings, The lawful basis for processing this data is Consent.

4. Supplier Data

This is the name, address, telephone number and email address as provided by the supplier or as obtained from publicity available sources. The information is used to help communicate with appropriate suppliers for the purchase of goods or services. The lawful basis for processing this data is that we are preparing to enter into a Contract for the purchase of those goods or services.

How we store Personal Data

Paper based data (e.g. booking forms, Trustees declaration forms) are held by the Committee member responsible for processing that particular data. This data is in locked premises.

Electronic based data is only stored and accessed by the responsible committee member using password protected computer devices.

The village hall has a Google account used primarily for gmail and a calendar of events.

The village hall committee makes extensive use of email to communicate with each other, with suppliers, with hirers etc. These emails require the use of 3rd party email services and some transient

use of 'cloud' storage. Google, other email suppliers and cloud storage service providers themselves have strict data protection policies and secure IT hardware and infrastructure.

Retaining Personal Data

Trustee data is a legitimate historical record of the Charity and so will be retained indefinitely.

Committee member's email addresses will be kept on the distribution list until a change in membership or until the data subject requests that their email address is removed.

Booking data provides support to financial transaction and so will be retained for three years in order to comply with financial audit requirements, After that it will be destroyed/delated.

Supplier data will be retained until the committee considers the supplier to no longer be considered for future provision of goods or services.

Who we share personal data with

We do and will not sell any personal data.

We will only disclose information to third parties when obliged to by law for the purposes of national security, taxation and criminal investigations, and the following situations:

- under the legal requirements of the Charity Commission
- as stated above, some documentation is held in 'cloud' storage. This is sharing in a purely technical sense as those services are delivered by 3rd parties and requires data to be held, at least temporarily, on their servers. This data is still private as this technical 'sharing' does not give permission for those providers to read/access the data held.
- where an individual expressly gives consent for the information to be shared.

Your rights

Important rights include:

- the right to be informed about what data is collected, how it is used and stored
- the right to ask us to remove your personal data from our records (unless it is necessary for us to continue
- the right to have inaccurate data rectified
- the right to request a copy of the information we hold about you.

There is more information about your rights at the Information Commission Office:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individualrights/>

Review

All policies are reviewed after the AGM and formation of a new committee in April each year.