

Egginton Memorial Hall

Data Protection and Privacy Policy - 4 June 2018

Introduction

The purpose of this policy is to set out the Egginton Memorial Hall ['EMH'] commitment and procedures for protecting personal data. The Trustees regard the lawful and correct treatment of personal information as very important to successful working, and to maintaining the confidence of those with whom we deal. We recognise the risks to individuals of identity theft and financial loss if personal data is lost or stolen.

The policy outlines how 'EMH' processes and manages personal data and:

- Refers to the Data Controller.
- Provides the lawful basis for processing personal data.
- Outlines the scope of personal data held and processed.
- Outlines the scope of the special category personal data held and processed.
- Outlines the process of Subject Access Requests.
- Contains a copy of the Privacy Notice.

The policies outlined within this document take effect from Friday 25th May 2018.

1. Data Controller

The Trustees, Caretaker, Bookings Secretary and Volunteers [collectively referred to as 'EMH Staff'] are personally responsible for processing and using personal information in accordance with the Data Protection Act and GDPR.

2. Lawful basis for processing

The processing of data is a legitimate interest and is necessary in relation to a hire or maintenance contract (or other connected or ancillary EMH business), which an individual(s) has entered into. Exceptional cases may also be processed under the lawful basis of consent.

EMH undertakes to always act within the reasonable expectations of those with whom we deal and any other individuals about whom we hold personal data.

3. Data sources

EMH needs to collect and use certain types of data in order to carry on our work of managing the Village Hall. Such data will be handled and stored securely.

The data held is that provided by hirers, donors and maintenance contractors when they contact EMH or are contacted by EMH.

4. Data held

The Data Protection Act 1998 ['DPA'] and General Data Protection Regulations ['GDPR'] govern the use of information about people (personal data). Personal data can be held on computers, laptops and mobile devices, or in a manual file, and includes email, minutes of meetings, and photographs.

EMH records predominantly include but are not limited to:-

- Names, addresses and email addresses;
- Telephone numbers;
- Special category data is rarely, if ever, sought or retained.

Proper steps will be taken to ensure that personal data is stored securely and only used for the above stated purposes. Access to personal information will be limited to EMH Staff and will not be shared with anyone else without prior consent.

5. European Economic Area

Data held will not be transferred outside the European Economic Area.

6. Data retention policy

Personal data will be held for no longer than we deem necessary, and for no longer than we specify in this retention policy. Some types of data will be held for longer than others.

- Hirers details, forms and connected e mails –For one full accounting year following the accounting year in which the hire took place.
- EMH Staff details and connected e mails – For one full accounting year after the year in which the EMG Staff member retires.
- Accounting information, including any of the above required for accounting purposes – For up to 7 full accounting years.
- Minutes and other data of historical significance (but excluding personal data) – To be held indefinitely.
- School Lease and related data, insurance data, strategic papers, policies– For as long as the papers continue to be needed and are useful.

7. Privacy Notice

The charitable company, Egginton Memorial Hall, uses personal data for the purposes of managing Egginton Village Hall, its bookings and finances, publicising events, Caretaker arrangements and occasional fundraising activities. Data will be retained in line with our data retention policy.

Please note we do not retain the e mail addresses of those accessing this site and will not pass your e mail address or other personal data on to any third parties without your consent.

If you wish to find out more about how we use your personal data, please contact the Hon. Secretary of Egginton Memorial Hall, whose contact details can be found on the Trustees page of the Egginton Village Website <http://www.egginton.org.uk/html/-trustees.htm>

8. Subject Access Requests

EMH will comply with Subject Access Requests in line with the guidance given by the Information Commissioner's Office;

- We will respond as quickly as possible, within 30 calendar days.
- We will request verification of the identity of any individual making a request, and ask for further clarification and details if needed.
- Data subjects have the right to the following:

- To be told whether any personal data is being processed. To be given a description of the personal data, the reasons it is being processed and whether it will be given to other organisations or people.
- To be given a copy of the information comprising the data, and given details of the source of the data where this is available.
- To have the data corrected if it is wrong.

9. Data Protection Officer ['DPO']

EMH is not required to appoint a DPO.

10. The Data Protection Act

This contains 8 principles for processing personal data with which EMH will comply.

Personal data:

1. Shall be processed fairly and lawfully and, in particular, shall not be processed unless specific conditions are met,
2. Shall be obtained only for one or more of the purposes specified in the Act, and shall not be processed in any manner incompatible with that purpose or those purposes,
3. Shall be adequate, relevant and not excessive in relation to those purpose(s).
4. Shall be accurate and, where necessary, kept up to date,
5. Shall not be kept for longer than is necessary,
6. Shall be processed in accordance with the rights of data subjects under the Act,
7. Shall be kept secure by the Data Controller who takes appropriate technical and other measures to prevent unauthorised or unlawful processing or accidental loss or destruction of, or damage to, personal information,
8. Shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal information.

11. What rights do you have to your personal data?

At any point while EMH is in possession of, or processing personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing, such as direct marketing.

- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: if our office refuses your request under rights of access, we will provide you with a reason why. You have the right to complain.

Please note that we will ask for identification should you choose to exercise any of the above rights in relation to personal data we hold.

We retain the right to update this policy at any time. If there are changes that significantly impact your rights, we will contact you in advance.

12. Making a complaint

If you are unhappy with the way that EMH has processed or handled your data then you have a right to complain to the Information Commissioner's Office ['ICO']. The ICO is the supervisory body authorised by the Data Protection Act 2018 to regulate the handling of personal data within the United Kingdom.

The contact details for the ICO are:

- Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF
 - Telephone: 0303 123 1113
 - Website: <https://ico.org.uk/concerns/>
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