





# Cliddesden Millennium Village Hall

# **Privacy Policy**

#### Introduction

Cliddesden Millennium Village Hall is committed to the protection and lawful, fair and transparent use and privacy of all Personal Data and Information that is supplied to the Hall in the course of its interaction with Trustees, employees, volunteers, Hall users and other parties.

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.

Personal Information within the context of this policy is any information that can identify an individual, including (but not exclusively) names, addresses (both postal and email), phone numbers and bank account details.

The terms "Personal Information", "Personal Data" or simply "Information" or "Data" may be used interchangeably but for the purposes of this policy, they all mean "Personal Information".

## **Collection and Usage**

Personal Information may be collected in a number of ways:

- As part of the Hall enquiry and booking process.
- As part of the staff recruitment process.
- As part of the new Trustee induction process.
- As a result of an individual being added to one of the Hall's information/newsletter distribution lists.

The collection and holding of this information will be for valid reasons and either through specific consent from the individual or by nature of a contract in place (or about to be put in place) between the Hall and individual.

Individuals will be informed about the collection and use of their Personal Information.

The Hall will use this information in the following ways:

- To communicate with Hall users, employees and Trustees.
- To manage the Hall booking process.
- To manage the Hall's employees.
- To facilitate financial activities such as paying employees and refunding Hall deposits.

Personal Information provided to the Hall will only be used for the purpose that it has been provided and for no other reason.

The Hall will make no attempt to determine or collect the identities of individuals who may choose to visit our website, Facebook page or other social media portal. The Hall may review standard log files and collect data that helps it identify, for example, the number of visitors to specific website pages but it will do this in a way that maintains user anonymity.

The Hall will remain the Data Controller for the information held. The Trustees, employees and volunteers are personally responsible for processing and using personal information in accordance with the Data







Protection Act and GDPR. Trustees, employees and volunteers who have access to personal information will therefore be expected to read and comply with this policy.

# **Security and Retention**

The Hall will abide by the following rules with regards to the security and retention of all Personal Information entrusted to it for safe-keeping:

- All Personal Information will be held securely at all times for a period dictated by accounting, legislative or insurance purposes and subsequently disposed of appropriately:
  - o Information relating to Trustees, employees and volunteers will be retained for 6 years from having left the position or role held.
  - o Information relating to Hall bookings will be retained for up to 7 years.
  - o Information relating to financial transactions will be retained for up to 7 years.
  - o Information relating to Health and Safety and Safeguarding issues will be retained indefinitely.
  - o Other information relating to the management of the Hall such as minutes and legal documents will be retained indefinitely.
- Personal Information will be kept and used solely for the purpose that it was supplied and intended.
- Personal Information will not be shared with any third parties unless there is a good reason or legal obligation to do so.
- Personal Information will not be used for the purposes of mass mailings unless prior consent has been obtained.
- Individuals have a right to access the Personal Information that the Hall holds relating to the Individual and request that inaccurate information is corrected or removed.

### **CCTV/Surveillance**

Where installed, CCTV is solely used for the purposes of monitoring building security and crime prevention and detection. Video and images video captured by CCTV will normally be kept for no longer than 3 months from recording. However, on occasions there may be a need to keep images for longer, for example where a crime is being investigated. You have the right to see CCTV video images of yourself and be provided with a copy of the video and images.

#### **Data Protection Officer**

Whilst there is no obligation for the Hall to appoint a Data Protection Officer, the Hall will maintain a single point of contact for the purposes of Data Protection and Privacy and will be contactable via the <a href="mailto:privacy@cliddesdenhall.org.uk">privacy@cliddesdenhall.org.uk</a> email address.

### **Enquiries**

All enquiries relating to this Privacy Policy and the privacy and security of Personal Information should be emailed to privacy@cliddesdenhall.org.uk.

## **Review and Approval**

The Management Committee will review and approve this Privacy Policy every three years and the approval will be minuted in the relevant Minutes of the Meeting of the Management Committee.