

DRINKSTONE WAR MEMORIAL INSTITUTE VILLAGE HALL COMMITTEE

DATA PRIVACY NOTICE POLICY – Revised October 2022

1. Your personal data – what is it?

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone, or in conjunction with any other information in the data controller's possession, or likely to come into such possession. The processing of personal data is governed by the General Data Protection Regulation (the 'GDPR').

2. Who Are We?

A nominated trustee of DWMI is the nominated data controller (see contact details in 10. below). The trustees will decide how your personal data is processed and for what purposes.

3. How Do We Process Your Personal Data?

The trustees of DWMI comply with its obligations under the GDPR by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

We use your personal data for the following purposes: -

- To fundraise and promote the interests of the charity, we maintain contact details for trustees and committee members;
- To manage our employees and volunteers;
- To maintain our own accounts and records (including the processing of Gift Aid applications; this information is accessible only to the Treasurer).
- To maintain the data necessary for administering Village Hall bookings. The personal data required is the contact information needed to complete the booking (name, address, telephone and email address). This information is stored in a Google electronic calendar which is password protected and accessible only to key Village Hall committee officers. The hire forms are kept in paper form only and stored by the Bookings Secretary/Treasurer in a secure environment;
- To maintain a contact list for some of the activities that take place in the Village Hall in case of unexpected cancellation of the activity;
- To enable payments by electronic bank transfer. These details are accessible by the treasurer and 2 authorised trustees.

4. What Is The Legal Basis For Processing Your Personal Data?

- Processing is necessary for carrying out legal obligations in relation to Gift Aid or under employment, social security or social protection law.
- Personal information must be provided by the Hirer (or someone acting on their behalf) in order to book the Village Hall. Processing of the personal data is necessary for the performance of the 'Contract to Hire' Drinkstone Village Hall. The lawful grounds for processing this data under the Data Protection Regulations is that Drinkstone Village Hall is entering a Contract with the individual (in this case the Hirer).
- There is a legal obligation under Charity Law for a charity to maintain personal information on its trustees.
- The legal basis for maintaining the contact list of individuals taking part in activities run by the Village Hall is consent.

5. Sharing Your Personal Data

Your personal data will be treated as strictly confidential. We will only share your data with third parties with your consent.

6. How Long Do We Keep Your Personal Data?

We keep Gift Aid declarations and associated paperwork for up to 6 years after the calendar year to which they relate. We keep records related to Village Hall bookings for a maximum of 24 months after the booking date. We keep contact details for trustees and committee members for as long as that person holds office. We keep contact lists for those involved in activities for as long as you are taking part in that activity.

7. Your Rights And Your Personal Data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data: -

- The right to request a copy of your personal data;
- The right to request that the trustees correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary for DWMI to retain such data;
- The right to withdraw your consent to the processing at any time;
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to lodge a complaint with the Information Commissioners Office (ICO).

8. Further Processing

If we wish to use your personal data for an additional purpose, not covered by this Data Protection Notice, then we will provide you with a fresh notice explaining this new use, prior to commencing the processing, and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

9. Data Breach Reporting Procedure

A personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. This includes breaches that are the result of both accidental and deliberate causes. It also means that a breach is more than just about losing personal data. A personal data breach can be broadly defined as a security incident that has affected the confidentiality, integrity or availability of personal data. In short, there will be a personal data breach whenever any personal data is lost, destroyed, corrupted or disclosed; if someone accesses the data or passes it on without proper authorisation; or if the data is made unavailable, for example, when it has been encrypted by ransomware, or accidentally lost or destroyed.

If a personal data breach occurs, the trustees will assess the likelihood and severity of the resulting risk to your rights and freedoms and, if necessary, notify the ICO within 72 hours. In the unlikely event of a data breach being assessed as of high risk (where the breach could have a significant impact on your rights and freedoms), we will inform you of the measures we are taking to deal with the breach.

10. Contact Details

To exercise all relevant rights, for queries or complaints, please in the first instance contact Sue Foulsham (tel 01449 736314).

You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.