

## Data protection policy

DEFINITIONS	
Charity / (BVH)	means Beech Village Hall and Recreation Ground, a registered charity.
GDPR	means the UK General Data Protection Regulation.
Responsible Person (DPL)	means Data Protection Leader (DPL): Kim Eakers
Register of Systems	means a register of all systems or contexts in which personal data is processed by the Charity.

### **SUMMARY**

Beech Village Hall and Recreation Ground (BVH) holds some personal information in order to carry out its charitable objective, being "the provision of a village hall and recreation ground for the use of the inhabitants of Beech and the neighbourhood", and for no other purpose.

BVH holds certain limited personal information about Village Residents, Event Attendees, Hall Hirers, Trustees, Volunteers and Contractors. This information is held securely and shared with individuals who need it to manage the Hall's activities.

Under our Membership programme, we send members occasional emails concerning the business of the Charity (such as AGM notices and materials) and, for those who wish to receive it, information about future events.

We continue to promote the Hall's activities and upcoming events in Beech News, on Nextdoor, Facebook, and the Village Website, and by distributing fliers, and posting on notice-boards around the village.

The Beech village website uses Google Analytics to help us improve it. This means that we use cookies and share this data with Google. This is why we ask for your 'Consent' when you access this website.

We use CCTV for the purpose of crime prevention and public safety.

## WHAT THIS POLICY COVERS:

This Policy Document sets out how the Beech Village Hall & Recreation Ground Charity collects, uses and protects personal information and how we comply with the UK GDPR. This Policy covers the activities of the Beech Village Hall Charity and its Trustees and Committee members, who will be referred to in this Policy as "BVH", "we", "our" or "us").

## WHAT PERSONAL INFORMATION DO WE COLLECT:

- Personal details of members, villagers, event attendees, hall hirers, contractors and volunteers (name,address, telephone number and email address)
- Bank sort code and account number when required to refund deposits from hirers
- Photographs of users taken for promotional purposes (eg social media, website, Beech News)
- CCTV video recordings

#### HOW AND WHY WE USE PERSONAL INFORMATION:

**Hall Hirers:** Under the lawful basis of Contractual Obligation within GDPR, we collect and use your personal information so that we can:

- 1. Respond to any enquiry or request.
- 2. Communicate regarding the supply and completion of Hire Agreements.
- 3. Produce invoices and statements.
- 4. Collect payments or make refunds.
- 5. Inspect regulatory policies or insurance such as Liability Insurance from 3rd Parties.
- Deliver or collect keys.



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**Members:** Under the lawful basis of Legitimate Interest within GDPR, we collect and use your personal information so that we can communicate with our local community, who have a right to attend and vote at general meetings **Members and Associate Members:** Under the lawful basis of Consent within GDPR, we collect and use your personal information in order to promote and manage enrolments at village events and activities.

**Contractors**: Under the lawful basis of Contractual Obligation within GDPR, we collect and use your personal information so that we can agree your scope of work, ensure tasks are completed and make payments to you **Volunteers**: Under the lawful basis of Consent within GDPR, we collect and use your personal information in order to manage the village activities that you are helping us to deliver

## The General Public:

- 1. We may use photographs taken at public events for promotional purposes.
- 2. We will only publish photographs taken at private events with permission.
- 3. We use CCTV for the purpose of crime prevention and public safety. Video is normally reviewed only in the event of a security or safety situation where evidence is needed.

When we need to communicate with multiple individuals regarding a common matter, we will endeavour to communicate on a one-to-one basis to prevent the sharing of personal information. Where one-to-one communications is not practical, we may use an email distribution list, but everyone will be blind copied (BCC) to hide their personal information.

## **COOKIES**

The Beech Village website uses Google Analytics, which allow us to recognise and count the number of visitors and to see how they move around the site when they are using it. This helps us to improve the way our website works, for example by making sure users can find what they need easily. This information is held by Google on their servers; we can access that information, and while it shows the activity on our website we cannot identify individuals.

#### HOW WE SHARE PERSONAL INFORMATION WITH OTHER ORGANISATIONS:

We may share personal information with other organisations only in the following circumstances:

- 1. For the purpose of delivering a service where we have engaged a third-party organisation.
- 2. If the law or a public authority says we must share the personal information.
- 3. If we need to share personal information to establish, exercise or defend our legal rights.
- 4. If you explicitly request or permit us to communicate directly with a third party in relationship to a service they are providing.
- 5. If a third party needs to liaise directly with a hirer to complete maintenance or service tasks and the hirer has provided their permission.

### **HOW WE PROTECT PERSONAL INFORMATION:**

- 1. Electronic files are stored securely with cloud-based service providers and on privately owned devices with strong password protection. We maintain a register of the systems that we use.
- 2. Video recordings are stored in a secure server at the Hall. Access to the recordings is controlled by BVH.
- 3. We enforce physical access controls to our buildings and files to keep this data safe.
- 4. We only authorize access to individuals who need the information to carry out their duties.
- 5. We enforce procedural safeguards in connection with the collection, storage and disclosure of personal data.
- 6. We may occasionally ask for proof of identity before we share your personal data with you.

Whilst we take appropriate technical and organisational measures to safeguard your personal data, please note that we cannot guarantee the security of any personal data that you transfer to us over the Internet.

## HOW LONG WE RETAIN PERSONAL INFORMATION FOR:

Hall Hirers: 5 years following the date of hire

Members: Until 30 days after you cease to be a Member by virtue of having left the village or by informing us that you wish to stop your membership

Associate Members: Until 30 days after you inform us that you wish to stop your membership

Event attendees: 2 years after the event (but downloaded information is retained for only 30 days after the event)

Contractors: 2 years following your resignation as a Contractor



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Volunteers: Until 30 days after you inform us that you wish to stop volunteering CCTV data is wiped after 30 days or as long as is necessary if evidence is required following an incident Data relating to incidents is retained for as long as the Management Committee deems it appropriate

### **YOUR RIGHTS:**

Under the General Data Protection Regulation, you have the right to see the personal information we hold about you. This is called a Subject Access Request. You also have the right to demand that we correct or erase your personal information, to restrict how we process it, and to object to our processing it.

If you would like a copy of the personal data we hold about you, or if you wish to withdraw your consent, complain or object, please email our DPL at: bookings@beechvillage.org.uk

We want to make sure that the personal data we hold about you is accurate and up to date. If any of the details are incorrect, please let us know and we will amend them.

### **CHANGES TO THIS GDPR POLICY:**

We reserve the right to make changes to this Data Protection Policy from time to time. We will post changes on the Beech village website.