**Hindolveston Village Hall Committee**

**Privacy Statement**

**The Purpose** of this general privacy statement is to explain how the Hindolveston Village Hall Committee (HVHC) processes personal data to fulfil its data protection responsibilities.

**The scope** of this privacy statement covers data processing of personal data by the Hindolveston Village Hall Committee (referred to as the **HVHC** for the remainder of this privacy notice).

**Privacy notices (PN)**, that are much more specific to purpose, will be issued separately when appropriate. As at December 2019, a PN is issued to those that wish to hire the Village Hall for the first time.

**The Role of the HVHC** in data protection terms, is that of a data controller where it determines the purpose and use of personal data collected. Once received, it becomes the responsibility of the Privacy Manager (**PM**) to ensure that it is processed in accordance with the latest UK data protection legislation. It is registered with the ICO: ZA547860.

**If you need to contact the PM**, please email using privacy.hvhc@gmail.com or write to The Privacy Manager, c/o Hindolveston Village Hall, The Street, Hindolveston, NR20 5DB.

**The nature of personal data processed by the HVHC** will only be contact information (such as name, address, email address and contact telephone) for the purposes of administering the various functions and groups of people involved in the Village Hall shown below:

* Committee members and others involved in managing the Village Hall;
* Volunteers who assist with or run aspects of the Village Hall;
* 100 Club which is a fundraising initiative to raise funds for the Village Hall;
* People who hire the Village Hall for private purposes; and
* Contractors who are paid to provide specific services to the Village Hall.

**We will need to share your personal data,** but it will only be disclosed to those that need to know it to fulfil their responsibilities and in the context the purpose for collection. For instance, volunteers’ names will appear on appropriate rotas. In principle, any sharing is kept to a minimum and is subject to regular review and will not, in any event, your personal data will not be shared with third parties for advertising or marketing purposes without your prior consent.

**Our duty of confidentiality** means that theHVHC staff will treat your personal data with due respect and in confidence. We also expect the same duty of confidentiality of all third partieswith whom we share your personal data, for example, workshop leaders, other event organisers or paid contractors. The HVHC uses reasonable organisational and technical measures to ensure personal data is kept secure.

**We process personal data against a lawful basis** and in accordance with the principles of data protection. More specifically we will process it:

* For the performance of a contract between us, in particular:
	+ With people who hire the hall;
	+ Contractors who provide a paid service; and
	+ Workshop/ event leaders.
* When it is necessary to comply with our legal obligations, including:
	+ Submission of committee members’ personal data to the Charities Commission; and
	+ In response to a valid request from an appropriate authority.

* Where we believe we have legitimate interests, including:
	+ Administering committee members and publicising their details on the village website and local noticeboards;
	+ Maintaining contact details of volunteers, workshop leaders and workshop participants; and/or
	+ Publicising events where the contact details of the organisers are displayed.
* When consent has been requested and given for specific purposes. It is important to know that you can always withdraw your consent by letting us know and we will remind you with each and every related communication. Such activities that will need your consent include:
	+ Participation in the 100 Club; and/or
	+ Subscribing to a Village Hall newsletter, or similar, if produced.
* When processing is necessary for the performance of a task carried out in the public interest, including:
	+ The maintenance of an archive of the names of those people who have hired the hall and the relevant dates of activity;
	+ The maintenance of an archive of the minutes of committee meetings that will, as a matter of routine, include the names of the committee members and visitors registered as having attended;
	+ The provision of reports of Village Hall related events that are distributed to the public via the Parish Council, social media or the village website (or similar).

**We process your data in the UK** using the private IT equipment and mobile phones of the relevant committee members who take reasonable measures to ensure it is processed and stored securely. All committee members are regularly briefed on the importance of using appropriate safeguarding and device back-up measures when using privately owned devices, as well as their duty of confidentiality. The key position holders only use dedicated email accounts when dealing with Village Hall related business.

**We follow a retention schedule** to determine the length of time we hold different groupings of personal data. This is shown below:

* Routine correspondence for casual and contract related business, in hard copy or in emails, will be stored for 2 years;
* Contact data is stored indefinitely unless you make a request to have it erased. Unless the HVHC has an over-riding basis to retain it, it will be erased;
* The names (only) of those people who have hired the hall and the relevant dates of activity, will be held indefinitely for archiving purposes;
* Minutes of committee meetings that includes the names of the committee members and possibly visitors registered as having attended, will be retained indefinitely;
* Financial records and invoices, which may include personal data, will be retained for 6 years after the end of the current tax year of processing; and
* By exception, documentation that includes your personal data may be retained by the HVHC for longer but only when we believe we have a legitimate interest or when we have a legal obligation to do so.

**At the end of the retention schedule** the HVHC will either return, destroy or delete the relevant documentation. If it is technically impractical to delete electronic versions of documentation that includes your personal data, it will put it beyond operational use. The HVHC allows up to 2 months after the retention schedule to complete these actions.

**The EU General Data Protection Regulation** (GDPR), which is enshrined into UK data protection legislation, defines your rights with regards to the way any business handles your personal data. Please note, these rights do not apply in all situations.

**The details on data subjects’ rights** can be found on the Information Commissioner’s Office (ICO) website: [www.ico.org.uk](http://www.ico.org.uk) but for ease of visibility, the key ones are listed below.

* Right to be informed;
* Right to access;
* Right to rectification;
* Right to erasure (‘right to be forgotten’);
* Right to restrict processing;
* Right to data portability;
* Right to object;
* Rights related to automated decision making and profiling; and
* Right to lodge a complaint directly to the ICO.

**To raise concerns, exercising rights or making queries** about the way in which the HVHC processes your personal dataplease contact the Privacy Manager in the first instance using the contact details provided above.

December 2019