**Hindolveston Village Hall Committee**

**Hall Hire Privacy Notice**

**This privacy notice explains** how the Hindolveston Village Hall Committee (HVHC) processes your personal data when hiring the Village Hall. For the purposes of this notice, you will be classed as either a regular hirer, i.e. someone who makes frequent or regular bookings, or a ‘one-off’ hirer.

**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 including the General Data Protection Regulation (GDPR) 2018. The PM can be contacted by email using [privacy.hvhc@gmail.com](mailto:privacy.hvhc@gmail.com).

**Requests to hire the hall** are handled by a serving member of the HVHC who is referred to as the ‘bookings officer’ in this notice. This is the person who will be processing your personal data in the first instance.

**The only personal data processed by the HVHC** will be contact information (such as name, address, email address and contact telephone) and only for the purposes of administering your booking of the Village Hall.

**We may need to share your personal data** but this will only be disclosed to those that need to know it to fulfil our contractual obligations to you and any statutory obligations we may have. In any event, your personal data will not be sold or shared with third parties for advertising or marketing purposes, unless we have 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 any and all third partieswith whom we need to disclose it.

**We process your personal data against one or more of the following lawful bases:**

* To fulfil our contract with you;
* When it is necessary to comply with our legal obligations, including responding to any valid request from an appropriate authority;
* Where we believe we have legitimate interests such as maintaining your contact details for any post event administration;
* When you have given us consent for specific purposes. It is important to know that you can always withdraw your consent at any time by simply letting us know; and
* When processing is necessary for the performance of a task carried out in the public interest such as the maintenance of an archive of the names of those people who have hired the hall against the relevant dates.

**We process your data in the UK** using the private IT equipment and mobile phone of the designated booking officer who takes reasonable measures to ensure it is processed and stored securely. Email is processed using a reputable web-based provider which is subject to the provider’s privacy policy. Paper records retained in a structured filing system are either stored at the booking member’s private residence or in a secure facility in the Village Hall.

**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 ‘one-off’ hirers, in hard copy or in emails, will be stored between one and two years. The actual paper copy of the completed booking form will be destroyed shortly after the date of the hire;
* Contact data for regular customers/hirers will be stored indefinitely unless there is a valid request from the relevant person to have his/her personal data erased. If it becomes apparent that a ‘regular’ customer is not going to make further bookings, then their personal data will be deleted or destroyed at that time;
* The names (only) of those people who have hired the hall and the relevant dates of activity, will be held indefinitely for archiving purposes;
* 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 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, in which case the relevant individuals will be informed.

**At the end of the retention schedule** the HVHC will either return, destroy or delete your correspondence/ 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 of all 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 relevant 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 object; 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