Rucklers Lane Community Association

Privacy Policy

Introduction

We need to collect and use certain personal information in order to manage Rucklers Lane Village Hall. In doing so, we are committed to protecting the rights and privacy of individuals. This statement sets out what information we collect and why, how we use, store and protect it, and what data protection rights you as a user have. It should be read in conjunction with our Data Protection Policy.

Our Contact Details

Village Hall 50 Rucklers Lane Herts WD4 8AU Website <u>https://rucklerslanehall.org.uk</u>

For questions regarding your personal data please contact the Bookings Secretary on **07391 850021** <u>bookingsecretary@rucklerslanehall.org.uk</u>

The information we collect and how we use it

The information we collect and process falls into the following categories:

Bookings Data

This is name and preferred contact details (email and/or postal addresses, telephone numbers) as supplied by a prospective hirer via the booking enquiry or booking form. Details of events or reasons for hire are also usually collected. The information will be used to manage bookings and maintain contact with both prospective hirers (for one-off events) and regular users. Public events (eg fundraising, club/group meetings, fitness classes) may by agreement be displayed on the booking calendar and may display details and contact information. Details of private events will not be displayed.

The lawful basis for processing this data is that we are entering into a Contract with the hirer of the facilities they wish to book.

General Enquiries Data

Contact details (name, email, telephone) and nature of enquiry may be supplied by enquirers via online form, telephone or email. This information will be used to communicate with the enquirer. The lawful basis for processing this data is consent.

Details for Promoting Village Hall Events and Activities

If the Village Hall decides in future to create an email distribution list as the basis for keeping in touch with hall users and supporters, this will be name and email details only. It will be provided by individuals who have explicitly consented to be on the distribution list. The lawful basis for processing this data is consent.

Trustee Data

This is name, contact details (address, email, telephone numbers), conflicts of interest if any and date of birth. We are required by law to notify the Charity Commission of these details. We also need to maintain effective communication with trustees. We may also record any relevant skills to help with managing projects or with specific roles. Only names (and organisations represented or posts held) will be publicly available.

The lawful basis for processing this information is consent and legal compliance.

Bank Details

Occasionally we collect and use the name, number and sort code of hirers or others' accounts. This information will only be collected and used with explicit consent for the direct payment (from the hall's bank account) of bills (against invoices), reimbursements or refunds (against receipts).

The lawful basis for processing this data is consent and to enable us to complete a legal obligation.

Supplier Data

This is name, address, telephone number and email address as provided by a supplier or as obtained from publicly available sources. The information is used to help communicate with appropriate suppliers for the purchase of goods or services.

The lawful basis for processing this data is that we may be preparing to enter into a contract for the purchase of those goods and services.

Disclosure Of Data

We will disclose information to third parties or individuals unconnected with the Hall when obliged to by law, for purposes of national security, taxation and criminal investigations. Otherwise, data may be shared in the following situations.

Booking data may be shared by the Booking Secretary with other Trustees (normally Chair, Treasurer or Secretary) and with the Caretaker, for instance where bookings involve licensable activity (for TENS applications) or particular hiring requirements or to consider new/unusual hiring.

Supplier details may be shared within the committee, eg when considering tenders/quotations.

Bank details will be shared in order to approve payment through the hall's bank account (two signatures required).

Trustee data is shared with the Charity Commission as this is a legal requirement.

Data may be shared where individuals have expressly given their consent for the information to be shared.

Some documentation may be held in 'cloud' storage. This is sharing in a purely technical sense as those services are delivered by 3rd parties and require data to be held, at least temporarily, on their servers. The data is still private as this technical sharing does not give permission for those providers to read/access the data held.

We do not, and will not sell any personal data.

How we store and secure personal data

To prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online. Paper based data (Trustee declaration forms, signed Booking Agreement Forms, etc.) is held in files by the Trustee

responsible for the processing of that particular data. The data is kept in locked premises. Electronic based data (eg Booking requests, email lists) is only stored and accessed using password protected computers/devices.

Booking data providing support for financial transactions will be retained for as long as needed to comply with financial audit requirements. After that point, it will be destroyed/deleted.

Email addresses may be collected and stored in a distribution list to enable information on events and other hall activities such as the AGM to be sent (by 'blind carbon copy') to interested parties. This data will only be collected and used for this purpose with the express consent of the individual. If any such list is gathered and maintained (for example via our website) using a specific service provider, then such data will be maintained and protected securely by that provider in accordance with their privacy regulations. In either event, information in email distribution lists will be kept on those lists until the data subject requests that their email address be removed. Other email addresses (eg for internal communication, hirers and suppliers) will only be retained for the purpose obtained.

Trustee data is a legitimate historical record of the Charity so will be retained indefinitely.

Supplier data will be retained until the committee considers the supplier no longer to be considered for future provision of goods or services.

Data related to invoices, completed projects etc will be retained for 6 years and then destroyed.

Payee bank details will be deleted and not be held in hall files after payment of any monies due. They may be retained in the system of our banker but only insofar as providing the basis for ease of future payments. Such records are held securely in accordance with the bank's own data protection policies and practices.

Your Rights

You have a number of very important rights in respect of your personal data. These include:

- The right to be informed about what data is collected and how it is used, stored, etc.
- The right to ask us to remove your personal data from our records (unless it is necessary for us to continue to use the data for a lawful reason).
- The right to have inaccurate data rectified.
- The right to request a copy of the information we hold about you. There is more information about your rights on the Information Commissioner's website <u>https://ico.org.uk</u>

Update And Review

This policy will be updated as necessary to ensure compliance with any changes or amendments made to the legal framework or required by the Charity Commission.

Rucklers Lane Community Association July 2024