**Digby War Memorial Hall**

**General Data Protection Regulation Policy**

**and Privacy Notice**

**Reviewed: May 2023**

Statement

GDPR stands for General Data Protection Regulation and replaces the previous Data Protection Directives that were in place. It was approved by Parliament in 2016 and came into effect on 25th May 2018. GDPR states that personal data should be ‘processed fairly & lawfully’ and ‘collected for specified, explicit and legitimate purposes’ and that individuals data is not processed without their knowledge and are only processed with their ‘explicit’ consent. GDPR covers personal data relating to individuals. Digby War Memorial Hall is committed to protecting the rights and freedoms of individuals with respect to the processing of hirers, stall holders, user groups, volunteers, trustees and contractors personal data. GDPR gives individuals the right to know what information is held about them. It provides a framework to ensure that personal information is handled properly.

**Lawful Basis**

**Digby War Memorial Hall processes personal data for the purposes of managing the hall. The lawful basis for processing the data is as follows:**

**1) Contract (between hirer, stall holder, user group and Digby War Memorial Hall).**

**2) Legitimate interests (only used for the purpose of managing the hall).**

**3) Consent (to display contact details etc).**

GDPR includes 7 rights for individuals:

1) The right to be informed.

Digby War Memorial Hall is a registered charity and is required to collect and manage certain data. We need to know the names of hirers, stall holders and user groups plus their contact, addresses, telephone numbers and email addresses. Digby War Memorial Hall is also required to hold data on its contractors although this is limited to names, addresses, email addresses, telephone numbers and bank account details for payments if required. As a registered charity Digby War Memorial Hall is required to hold data on its trustees and volunteers: names, addresses, email addresses, telephone numbers and dates of birth. Names, addresses and dates of birth are uploaded to the Charity Commission website via a password protected system. Digby War Memorial Hall uses Cookies on its website to collect data for Weebly Analytics, and this data is anonymous. In addition, data is collected about Digby War Memorial Hall Facebook page activity; again this data is anonymous. Digby War Memorial Hall uses a password protected email account which is accessed only by the secretary.

2) The right of access.

At any point an individual can make a request relating to their data and Digby War Memorial Hall will need to provide a response (within 1 month). Digby War Memorial Hall can refuse a request, but only if there is a legal basis to do so and will inform the individual of the reasons for the rejection. The individual will have the right to complain to the ICO if they are not happy with the decision. (Any individual requesting information must have their identity verified first via photographic id and proof of address.)

3) The right to erasure.

You have the right to request the deletion of your data where there is no compelling reason for its continued use. However Digby War Memorial Hall has a legal duty to keep some details for a reasonable time, for example accident records. Such records are archived securely offsite and shredded after the legal retention period.

4) The right to restrict processing.

Hirers, stall holders, user group contacts, trustees, volunteers and contractors can object to Digby War Memorial Hall processing their data. This means that records can be stored but must not be used in any way, for example reports or for communications.

5) The right to data portability.

Digby War Memorial Hall requires data to be transferred from one IT system to another; such as from Digby War Memorial Hall to the Charity Commission. If transferred electronically, secure file transfer systems are used and if hard copy information is shared it is delivered by registered post. Digby War Memorial Hall ensures that these partners have their own policies and procedures in place in relation to GDPR before transferring or sharing data.

6) The right to object.

Hirers, stall holders, user group contacts, trustees, volunteers and contractors can object to their data being used for certain activities like marketing or research and this would never be carried out without consent.

7) The right to rectification.

You have the right to request amendments to inaccurate data. All data must be accurate, complete and up to date.

Automated decisions and profiling are used for marketing based organisations. Digby War Memorial Hall does not use personal data for such purposes.

Storage and use of personal information

All paper copies of hire forms, stall bookings and user group records are kept by the booking clerk in a secure location within their home. These records are shredded / deleted after the event or when the user group no longer wishes to hire the hall. Contact details for user groups are also held by the treasurer.

All paper copies of volunteers, trustees and contractors records are kept by the secretary in a secure location within their home. The exception to this are contact details (telephone numbers and emails) of fellow trustees and volunteers held by the all committee members.

Digby War Memorial Hall collects a large amount of personal data every year including; names and contact details of those enquiring about the hall or event. These records are shredded / deleted if the booking does not go ahead.

Upon a trustee or volunteer leaving the Digby War Memorial Hall, their personal data is shredded / deleted.

No photos of adults or children are used on the Digby War Memorial Hall website or social media site without consent. Trustee names and contact details are listed in the hall once consent has been obtained.

All home computers (including laptops and iPads) used by any of the management committee (in particular the booking clerk, secretary and treasurer) are password protected. Any portable data storage used to store personal data, e.g. USB memory stick, are password protected and/or stored in a secure area.

As a charity, some limited personal data (names, telephone numbers) is gathered and held for fundraising activities (for example, sponsor forms, raffle tickets etc) however these are destroyed immediately after the event.

Any loss of personal data must be reported by the trustees to the management committee who will decide if the ICO needs to be informed. The secretary is the Data Protection Officer.

*GDPR means that Digby War Memorial Hall must:*

*Manage and process personal data properly*

*Protect the individual’s rights to privacy*

*Provide an individual with access to all personal information held on them*