



EDITH BANKES MEMORIAL HALL

HIGH STREET, NORTHOP

REGISTERED CHARITY NO. 217747

Data Protection Policy and Privacy Notice

Prepared by Robert Mackey, Chairman November 2023

Next review due September 2025

Introduction

The trustees of the hall are committed to a policy of protecting the rights and privacy of individuals. We need to collect and use certain types of Data in order to carry on our work of managing Edith Bankes Memorial Hall. This personal information must be collected and handled securely.

The Data Protection Act 1998 (DPA) and General Data Protection Regulations (GDPR) govern the use of information about people (personal data). Personal data can be held on computers, laptops and mobile devices, or in a manual file, and includes email, minutes of meetings, and photographs.

The charity will remain the data controller for the information held. The trustees, staff and volunteers are personally responsible for processing and using personal information in accordance with the Data Protection Act and GDPR. Trustees, staff and volunteers who have access to personal information will therefore be expected to read and comply with this policy.

General principles

The Trustees of Northop Village Hall (EBMH) are committed to processing data in accordance with its responsibilities under the GDPR. To achieve this we commit to the following principals when handling your personal data and we will ensure that it is: -

- Processed lawfully, fairly and in a transparent manner in relation to individuals;
- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- Adequate relevant and limited to what is necessary in relation to the purposes for which they are processed;
- Accurate and, where necessary, kept up to date; with every reasonable step taken to ensure that personal data that is inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and

- Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.”

The Trustees assure all users that personal data collected will never be sold or made available to 3rd parties without your specific consent

General provisions

- This policy applies to all personal data processed by EBMH.
- The Trustees take responsibility for the EBMH's ongoing compliance with this policy.
- This policy shall be reviewed bi-annually in September for approval at the AGM
- EBMH is not required to register with the Information Commissioner's Office as an organisation that processes personal data.

Lawful, fair and transparent processing

To ensure its processing of data is lawful, fair and transparent, the Trustees commit to maintaining appropriate systems that are compliant with the relevant GDPR.

- These systems shall be reviewed annually at the AGM to ensure their fitness for purpose.
- Individuals have the right to access their personal data and may request we delete any such data.

The Trustees will ensure requests of this nature shall be dealt with in a timely manner.

Lawful purposes

- a. All data processed by EBMH is done so on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests (see ICO guidance for more information).
- b. EBMH's lawful basis is primarily contractual i.e. User, Hire and individual service provision.

Data minimisation

The Trustees will ensure that personal data gathered and retained is limited to that which is deemed adequate and relevant to what is necessary in relation to the purposes for which they are processed.

Accuracy

The Trustees will take appropriate steps to ensure personal data we hold is accurate.

Where necessary for the lawful basis on which data is processed, we will endeavour to ensure that personal data is kept up to date.

Archiving / removal

The Trustees shall ensure that personal data is kept for no longer than necessary and will normally be deleted after 3 years unless we have further reason to use the information i.e. repeat bookings

All information retained will normally only be accessible to the Trustees,

Staff and relevant volunteers may be provided access where required where required for liaison with hall users.

Security

All personal data stored will be done so securely using modern secure software that is kept-up-to-date.

Access to personal data shall be limited only to the Trustees who need access and appropriate care will be taken to avoid unauthorised sharing of information.

When personal data is deleted this will be done safely so that the data is irrecoverable.

Appropriate back-up and disaster recovery solutions are in place.

Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the EBMH Trustees shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO (more information on the [ICO website](#)).