

# East Horsley Village Hall CIO

East Horsley Village Hall Management Committee

Charity Registration Number 1000317

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## **DATA PROTECTION POLICY**

**Effective from 25<sup>th</sup> May 2018**

### **Your Privacy**

Your privacy is very important to us. The East Horsley Village Hall Charitable Incorporated Organisation (“the Hall”) provides this notice explaining its data protection policy. This document sets out the Hall’s information practices and the choices you can make about the way your information is collected and used. The Hall is managed by Trustees with the day to day running of the Hall done by the Hall Manager.

### **Compliance with the law**

The Hall complies with the provisions of the *General Data Protection Regulations* which take effect from 25<sup>th</sup> May 2018. The lawful basis on which the Hall collects and processes personal data (i.e. for a private individual) is limited to the following:

*Regulation 6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract.*

As a general principle, the Hall collects and processes no other information about individuals than is necessary for the performance of, or preliminary enquiries about, a hire contract. The Hall only retains the information for as long as is necessary for the Hall to perform its contract with you. The information collected can only be accessed by the Hall Manager and Trustees.

Once your legal relationship with the Hall has finished, the Hall Manager will take all practical steps to erase personal information, except where exceptions are clearly identified later in this policy.

The Hall will never hold personal data unnecessarily nor will the Hall sell or pass personal information to third parties.

The Hall has a number of contracts with suppliers of goods and services. The majority of these are with limited companies whose contact information is already in the public domain. However, some suppliers and contractors may be sole traders, trading from a private address.

Details of these contracts may be published for transparency purposes, and all invoices from such suppliers are retained and published un-redacted (no details erased or hidden).

As a charity, The Hall has a legal obligation to demonstrate how its funds have been spent and considers the lawful basis for retaining this information to be:

6(1)(c) – *Processing is necessary for compliance with a legal obligation*

## **Our Commitment to Children’s Privacy**

Protecting the privacy of the very young is especially important. For that reason, the Hall will never collect or maintain information from those we actually know are under 18, and no part of our website is structured to attract anyone under 18.

## **Collection of Personal Information from the Village Hall website**

When visiting the Hall website, the IP address of the device used to access the site, along with the dates and times of access, may be logged by the Hall’s internet service provider. The Hall will not use that information for analysis of the data.

## **Collection and use of Personal Information for Village Hall Bookings.**

When a hall booking is made, we collect the following personal information from the potential hirer to enable us to enter into a hire contract:

- First name and surname of person responsible for the hire (the hirer)
- The organisation of which the person responsible for the hire is a member.
- Residential address of the hirer
- Email address of the hirer
- Mobile phone number of the hirer and land line number where available
- Bank or other payment details. This information is provided on cheques sent by hirers so we can obtain payment for the services provided. Cheques are stored securely by the Hall Manager. Bank details may be obtained to facilitate the return of any deposit.

## **Data collection for contractors and suppliers**

Information regarding names, addresses and other data details is also retained for contractors and suppliers of goods and services to the Hall, whether or not the contractor and supplier is a body corporate or otherwise. In many cases this information will be publicly available on contractors and suppliers websites. However the Hall retains banking details of suppliers and contractors to enable the Hall to pay contractors and comply with its contractual obligations. Other than is necessary to comply with its legal obligations including the enforcement of any contract, these details will not be disclosed by the Hall but will be retained for the period stipulated by the Limitation Acts then in force.

## **Privacy Policy**

Data obtained from hirers is stored in the Hall’s Avalon bookings database. This data can only be accessed by the Manager of the Village Hall and the Hall Trustees. The data is used to prepare the booking Email and contract which is sent to the hirer using the Hall email account.

The name of the individual or organisation responsible for the booking is entered into the Hall schedule. Only the name of the hirer is shown and no other personal information relating to the hirer is shown on the schedule entry. The name of the hirer is an essential

link to the financial transaction associated with the hire. For transparency reasons, it cannot be erased completely from the Hall's accounts.

Other than for the recurring bookings, the personal data in the bookings database (other than the name of the hirer) is retained as long as it remains necessary. No one, other than the Trustees and the Manager of the Hall, has access to the information provided.

All devices that have access to the data in these accounts are password and/or PIN secured.

### **CCTV Monitoring**

The Hall's entrance lobby and outside surrounding areas are monitored by CCTV for security and compliance purposes. The CCTV images are erased automatically after 21 days and not retained beyond that period.

### **Changes to this Privacy Statement**

The contents of this statement may be altered at any time, at the Hall's discretion.

If you have any questions or concerns about the Hall's use of your data please contact the Hall Manager in writing at the address above or email us at [villagehall@easthorsley.net](mailto:villagehall@easthorsley.net)