

DATA PROTECTION POLICY

1. This policy explains our information practices and the choices made about the way information is collected and used.
2. The General Data Protection Regulation (GDPR) was a new, Europe-wide law that replaced the Data Protection Act 1998 in the UK. It was part of a wider package of reform to data protection law that included the Data Protection Bill. The GDPR set out requirements for how organisations would need to handle personal data from 25 May 2018 onwards. The GDPR applied to 'personal data', which meant any information relating to an identifiable person who could be directly or indirectly identified, in particular by reference to an identifier.

Compliance with the law

3. The trustees will comply with the General Data Protection Regulation (GDPR) introduced in May 2018.
4. The lawful basis on which we collect and process personal information (i.e. for private individuals) is limited to the following:
 - Article 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*
5. As a general principle, we only collect information to establish a contract with the hirer. We process no other information about individuals.
6. We retain this information for as long as is necessary in order to complete our annual audit and to analyze the use of the hall over time. We will not share this information with any third parties.
7. The trustees have a number of contracts with suppliers of goods and services. Most of these are with limited companies whose contact information is already in the public domain. However, some 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 may be published un-redacted, that is, with no details erased or hidden. The trustees have a legal obligation to demonstrate how funds have been spent and consider this a lawful basis for retaining this information.
 - Article 6(1)(e) - Processing is necessary to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law*
8. Personal data is collected and held about the trustees to ensure that their appointment and tenure complies with charity law.

Our commitment to children's privacy

9. Protecting the privacy of children is especially important. For that reason, we will never collect or maintain information from those we know are under 18, and no

part of our website is structured to attract anyone under 18. Persons under 18 are not permitted to hire our facilities.

Collection of personal information from the village hall website

10. When visiting our website, the IP address of the device used to access the site, along with the dates and times of access, will be logged by our internet service provider. This information will be used to analyze usage trends.

11. Recorded IP addresses are not linked to personally identifiable information. The web site does not use cookies or other methods of recording visits to the site.

Collection and use of personal information for village hall bookings

12. When a booking is requested, we collect the following personal information from the hirer to enter into a hire contract:

- First name and surname of person responsible for the hire (the hirer)
- The club, group or organization that the hirer represents
- Residential address of the hirer
- Email address of the hirer
- Mobile number of the hirer and land line number where available.

13. This information is stored in our database. Only designated trustees and the software company responsible for the booking system can access this data. The data is used to confirm bookings, ensure payments and analyze the use of the hall.

14. The online booking calendar is visible to the public on our website. Only the purpose of the hire is shown and no personal information relating to the hirer is stored with the calendar entry. The name of the responsible hirer is stored as an essential link to the financial transaction associated with the hire. For transparency reasons, it cannot be erased completely from our accounts.

15. Where hirers choose to make online payments for the hire of facilities, either by using bank cards or PayPal, hirers will need to refer to the data protection and privacy policies of those organizations with regard to the use and storage of personal information associated with the payment process. Banks and PayPal may retain records indefinitely of invoices sent and payments made, and we are not yet able to erase these. We will retain no information about credit or debit cards.

16. Designated trustees may access the archived information of banks or PayPal and any address details that the hirer has associated with their account at the time of payment (if they have used an account). However, this information will never be saved by the trustees and will not be routinely accessed. The trustees have no interest in these details once a payment has been made.

17. All systems that require access will be protected by password, PIN or fingerprint.