

Data Protection Policy

# Data Protection Principles

The Charity is committed to processing data in accordance with its responsibilities under the GDPR. Article 5 of the GDPR requires that personal data shall be:

* Processed lawfully, fairly and in a transparent manner in relation to individuals.
* Collected for specific, explicit and legitimate purposes and nor 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; every reasonable step must be taken to ensure that personal data that are 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 are 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.
* 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.

# Definitions

CHARITY means Catisfield Memorial Hall is a registered charity

GDPR means the General Data Protection Regulation.

RESPONSIBLE PERSON means THE CURRENT CHAIRMAN is the person responsible for date protection within the Chairity.

REGISTER OF SYSTEMS means a register of all systems or contexts in which personal data is processed by the Charity.

# General Provisions

* This policy applies to all personal data processed by the Charity.
* The Responsible Person shall take responsibility for the Charity’s ongoing compliance with this policy.
* This policy shall be reviewed annually.
* The Charity shall 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 Charity shall maintain a Register of Systems.
* The Register of Systems shall be reviewed annually.
* Individuals have the right to access their personal data and any such requests made to the charity shall be dealt with in a timely manner.

# Lawful Purposes.

* All data processed by the Charity must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests.
* The Charity shall note the appropriate legal basis in the Register of Systems.
* Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
* Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the Charity’s systems.

# Data Minimisation

* The Charity shall ensure that personal data is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

# Accuracy

* The Charity shall take responsible steps to ensure personal date is accurate.
* Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

# Archiving/Removal

* To that personal data is kept for no longer than necessary, the Charity shall put in place an archiving policy for each area in which personal data is processed and review this process annually.
* The archiving policy shall consider what data should/must be retained, for how long and why.

# Security

* The Charity shall ensure that personal data is stored securely using modern software that is kept up to date.
* Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
* When personal data is deleted this should be done safely such that the data is irrecoverable.
* Appropriate back up and disaster recovery solutions shall be in place.

# Breach

In the event of a breach of security leading to accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data, the Charity shall promptly assess the risk to people’s rights and freedoms and if appropriate report this breach to the ICO.

# Appendix 1

# Privacy Statement

This Privacy Statement applies to the Catisfield Memorial Hall, Charity Number 301774 and its website and social media pages. It explains what personal information we collect about you and how we use it.

# Data Collection

We collect your personal information when you make enquiries with us, fill out a booking form and when you visit our website or social media pages.

# How we use your information.

This Privacy Statement tells you what to expect when we collect personal information. We will make it clear when we collect personal information and will explain what we intend to do with it.

Your privacy is very important to us. We **DO NOT** share your personal information with third parties unless we have your consent, or to comply with a legal obligation. We **DO** NOT use your personal information for marketing purposes. Unless otherwise requested, we will keep data for 2 years after it was last used.

# Contact with the Memorial Hall

Information that may be requested and held by Catisfield Memorial Hall includes full name and title, postal address, telephone number(s) and email address. Unless advised otherwise we may use any of this data to contact you regarding all aspects of your booking. The data **will not** be used for any other purpose without your consent. No other personal data will be requested or held by Catisfield Memorial Hall.

# Website and online date

When someone visits the Catisfield Memorial Hall website or its Facebook page, standard internet log information is collected plus details of visitor behaviour patterns. We do this to find out things such as the number of visitors to various parts of the site. This information is collected in a way that does not identify users personally.

We are not responsible for the content or reliability of any linked web sites and do not necessarily endorse the views expressed within them. We cannot guarantee external links will work at all times and we have no control over their availability. You should read the privacy statements for all websites you visit. Your

# Your Rights and Pesonal Data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

* The right to request a copy of your personal data
* The right to request that Catisfield Memorial Hall corrects any personal data if found to be inaccurate or out of date.
* The right to request your personal data is erased.
* The right to withdraw your consent to the processing at any time.
* The right where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing.
* The right to lodge a complaint with the Information Commissioners’s Office.

# Further Uses

If we wish to use your personal data for a new purpose, not covered by this Privacy Statement, then we will provide you with a new statement explaining this new use and setting out the relevant purposes and processing conditions. We will seek your prior consent before using your personal data for a new purpose.

# Contact Details

For all enquiries or complaints please, in the first instance, contact the Booking Secretary at bookings.cmh@gmail.com or 07379 0f51822. Data protection complaints or issues will be dealt with by the Chair of Catisfield Memorial Hall Trustees.

You can contact the Information Commissioner’s Office on 0303 123 1113 or via internet at <https://ico.org.ukk/global/contact-us/email> or by post at the Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Change Record

|  |  |  |
| --- | --- | --- |
| **Date of Change:** | **Changed By:** | **Comments:** |
| 21st March 2019 | THL | Policy approved by the Trustees and adopted |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |