

29 August 2024

Harby Village Hall Privacy Policy



Harby Village Hall Committee

Version 1.1
Charity Number:1071575



Contents

Introduction	1
The Data We Collect and How We Use It.....	1
How We Store Your Personal Data	3
How Long We Retain Your Personal Data.....	4
Who We Share Your Personal Data With.....	4
Your Rights	5

Introduction

Harby Village Hall is committed to protecting and respecting the privacy of personal data. The purpose of this privacy notice is to help you understand what we do with any data you provide and how we process and protect it.

The management committee of Harby Village Hall is the ‘data controller’, which means it decides how we hold and use your personal information. We also employ the Hallmaster and TicketSource systems as ‘data processors’, processing hall bookings and ticket sales respectively on our behalf.

The Data We Collect and How We Use It

The data we collect falls into the following main categories:

(1) **Bookings data.** This is name, address, telephone number and email address as supplied by a prospective hirer when making a booking request. Such information was previously collected via a physical Booking Agreement Form but is now predominantly acquired through the Hallmaster online booking system. The data is used to ensure effective communication throughout the booking process, from initial request through to invoicing and banking of payment. The lawful basis for processing the data is that we are entering into a contract with you for the hire of the facilities you wish to book.

(2) **100 Club data.** This is name, address and email address as supplied by the individual applying to join the club. The data is collected via the 100 Club Application Form and used to ensure effective running of the monthly draws and communication with prize winners. The lawful basis for collecting this data is that we are entering into a contract with you for including you in the monthly draws.

(3) **Personal data collected when supplying tickets for events.** This may include name, address, telephone number and/or email address when tickets are reserved either directly from the event organisers or via the TicketSource booking system. The lawful basis for this is that we are entering into a contract with you to supply these tickets and access to the event.

(4) **Personal data collected when responding to other enquiries from members of the public.** This will typically be the name and email address of the enquirer, together with any other personal information contained in their message. The lawful basis for this is that we have a legitimate interest.

(5) **Distribution lists.** Email distribution lists are used to provide recipients with information relating to the village hall and to request support from interested parties for tasks such as running events and maintaining the hall. We may also use WhatsApp for such communications, which entails storing phone numbers. Individuals are only included in these lists if they have explicitly opted in. The lawful basis for storing and using this information is that we have your consent.

(6) **Trustee data.** This is name, address, telephone number, email address and date of birth. We are required by law to notify the Charity Commission of these details of the trustees. It is also necessary for there to be effective communication between trustees. The lawful basis for processing this data is therefore twofold. Firstly, there is the legal obligation of keeping details up to date with the Charity Commission. Secondly, there is legitimate need for effective communication between committee members. Similar data is held for Associate Members of the Village Hall Committee, except this is not submitted to the Charity Commission.

(7) **Supplier data.** This is name, address, telephone number and email address as provided by the supplier or as obtained from publicly available sources (e.g. internet, telephone book). The information is used to help communicate with appropriate suppliers for the purchase of goods or services. The lawful basis for processing this data is that we are preparing to enter into a contract for the purchase of those goods and services.

How We Store Your Personal Data

Paper-based data (e.g. Trustee and Associate declaration forms, 100 Club application forms, Booking Agreement forms) is stored in a secure location by the committee member responsible for the processing of that particular data.

Harby Village Hall has a Microsoft 365 subscription which provides password-protected accounts to the Trustees and active Associate committee members. This includes email accounts, access to web versions of Microsoft apps and secure 'cloud' file storage for files held electronically, with OneDrive being used for individuals' storage requirements and SharePoint used for documents that are shared across the committee. Shared mailboxes are used where appropriate, with access to these limited to those committee members who deal with that aspect of the hall's activity. For example the shared Bookings mailbox is accessed by the booking administrators and treasurer and the Events mailbox is accessed by the core events organising team. Email distribution lists are typically held as contacts within these shared mailboxes. When there is a need to store personal information outside of such contact lists, for example in a spreadsheet, access to this file will be limited to the relevant committee members and the file will be password-protected where appropriate to provide an extra layer of security.

The village hall committee makes extensive use of email to communicate with each other and with suppliers, volunteers, hirers, etc. Email requires the use of 3rd party email services and, as part of this, there is at least transient use of this 3rd party cloud storage.

The Microsoft services and all email accounts are password-protected. Where such passwords have been saved on a device, that device will have appropriate protection (e.g. password, passcode, fingerprint or facial recognition) in case of loss or theft. Microsoft and other email and cloud storage service providers themselves have very strict data protection policies and highly secure IT hardware and infrastructure.

The Microsoft 365 system described above was initiated in late 2023 and will become fully operational during 2024. During the changeover period some personal data will continue to be held in the systems previously used, but the eventual aim is for all such data to be removed from those systems. Examples are email messages and contacts stored in accounts previously provided by our web services provider and electronic documents held by trustees in personal file storage. Future versions of this privacy document will provide updates on the status of the data migration.

How Long We Retain Your Personal Data

Bookings data provides support to financial transactions so will be retained for 7 years in order to comply with financial audit requirements. After that point, it will be destroyed/deleted.

When a 100 Club member does not renew their membership, their data will be retained for 15 months after the final monthly draw covered by that membership has been made. After that point, it will be deleted. Similarly, personal data held in association with other Harby Village Hall events will be deleted 15 months after the event.

Email addresses and/or phone numbers in a distribution list will be kept in that list until the individual concerned requests that they are removed.

Trustee data provides a legitimate historical record of the Charity so will be retained indefinitely.

Supplier data will be retained until the committee considers the supplier to no longer be considered for future provision of goods or services.

Enquirer data will be retained until the recipient considers the enquiry has been successfully dealt with and is unlikely to require further follow-up.

Who We Share Your Personal Data With

We do not and will not sell any personal data.

We will only disclose information to third parties or individuals when obliged to by law, for purposes of national security, taxation and criminal investigations, and the following situations:

- For the 100 Club, the name of each monthly draw winner is shared with the Harby Journal for publication in the next issue. Winners' names may also be publicised on the Harby Village Hall Facebook page and/or website, but only if the club member has provided explicit permission for this to happen.
- Trustee data is shared with the Charity Commission as this is a legal requirement.
- As stated above, some documentation is held in 'cloud' storage. This is 'sharing' in a purely technical sense as those services are delivered by 3rd parties and requires data to be held, at least temporarily, on their servers. The data is still private as this technical 'sharing' does not give permission for those providers (e.g. Microsoft) to read/access the data held.
- Where you have expressly given your consent for the information to be shared.

Your Rights

Under data protection law, you have rights which include:

- the right to be informed about what data is collected and how it is used, stored, etc. – this Privacy Notice is itself a key part in that;
- the right to ask us to remove your personal data from our records (unless it is necessary for us to continue to use the data for a lawful reason);
- the right to have inaccurate data rectified;
- the right to request a copy of the information we hold about you.

There is more information about your rights at the Information Commissioner's Office at this link:

<https://ico.org.uk/for-the-public/>

If you have any questions regarding your personal data, please contact chair@harbyvillagehall.co.uk

If you prefer not to use electronic communication, questions can be addressed to:

The Committee Chairman
Harby Village Hall
40 School Lane
Harby
Melton Mowbray
Leicestershire
LE14 4BZ

Supplementary Information

The privacy policies of our data processors can be found at the following locations:

Hallmaster: <https://www.hallmaster.co.uk/Docs/Hallmaster-Privacy-Policy.pdf>

TicketSource: <https://www.ticketsource.co.uk/kb/terms-of-use/customer-data-privacy-policy>