

**Lakeview Village Hall**  
**Data Protection Policy**  
**November 2018**

The Lakeview Village Hall is a not for profit organisation registered with the Charity Commission (ref no: 1148226) and is required to retain certain information about its Directors, its employees and its service users in order to be able to carry out its day to day operations, to meet its objectives and to comply with legal obligations.

The organisation is committed to ensuring that any personal data is dealt with in line with the Data Protection Act 1988 and the General Data Protection Regulation (GDPR). To comply with the law, personal information will be collected and used fairly, stored securely and not disclosed to any other person unlawfully.

In line with the Data Protection Act 1998 and the General Data Protection Regulation, the organisation will ensure that personal data:

- Is obtained fairly and lawfully and for a specific and lawful purpose
- Is adequate and relevant, but not excessive
- Is accurate and up-to-date
- Will not be held longer than necessary
- Is processed in accordance with the rights of data subjects
- Is subject to appropriate security measures

**Lakeview Village Hall processes the following personal information:**

Directors/committee members	Names, addresses and contact details
Employees	Names, addresses, contact details, bank account details
Service Users	Names, addresses, contact details, bank account details
Marketing Recipients	Email addresses only

**Lakeview Village Hall will ensure that data:**

- Will not be sold to companies or given to public organisations. Personal data (names, addresses, emails and phone numbers) will only be passed to other members of the team to enable appropriate provision of services (eg to a caretaker or the Bar Person)
- Will be processed for the purposes stated only (i.e. the successful hiring of rooms/facilities)
- Will be accurate and kept up to date
- Will be erased from the files within two months from when your active relationship with the Village Hall ends
- Will be retained in a secure place and, where relevant, on a computer which is password protected.

## Procedure for implementing the Data Protection Policy

### 1. Privacy Notice

The following privacy notice will be added to the hall's website; the online booking form and any hard copy documentation providing details of the terms of hire for rooms and facilities:

*Lakeview Village Hall will retain personal and other relevant data for as long as is necessary to complete preparations for the event(s) for which you are hiring facilities within the Village Hall. This information will be held securely and shared only with those associated with the event (eg Caretaker/Bar Person). This information will not be shared with outside agencies, but the Village Hall Committee reserves the right to use the contact details to inform you of other services/events within two months of the date of your event booking.*

The following privacy notice will be added to the hall's website in any location where users are asked to sign up for marketing communications:

*Your email address will be retained only for the purposes of sending communications related to marketing, news and events. You may unsubscribe from these emails at any time by clicking the unsubscribe button in any of our communication emails. When you unsubscribe, your email address is deleted from our systems immediately.*

### 2. Informed Consent

At the point of engagement with the Lakeview Village Hall, service users will be asked to give their explicit consent to the Village Hall's appropriate use of their data. The following statement will appear on all hard copy and online application forms:

*I hereby give my consent to the Lakeview Village Hall to retain, use and share the personal data I have supplied in relation to my booking(s) in line with the General Data Protection Regulation 2018 and its own Data Protection Policy. I understand that my data will be erased from their files within two months of the cessation of my relationship with the Village Hall.*

### 3. Data Protection Officer

It is neither appropriate nor necessary for the Lakeview Village Hall to appoint a Data Protection Officer. **(This is because it is neither a public authority; an organisation carrying out regular and systematic monitoring of individuals on a large scale or an organisation carrying out the large scale processing of special categories of data, such as health records or information about criminal convictions – paragraph 11 of Preparing for the General Data Protection Regulation published by ICO).** However, responsibility for ensuring compliance with the General Data Protection Regulation lies with the Directors. It is anticipated that any issues from service users will be directed in the first instance to the Site Manager who will report to the Directors via the Village Hall Committee.

### 4. Subject Access Requests

Subject access requests should be submitted in the first instance to the Site Manager. All requests will be dealt with within 28 days and there will be no charge.

### 5. Data Breaches

Any instance of a data breach should be submitted to the Site Manager who will refer the matter to the Directors. The Directors will nominate one of their number to investigate the matter.

#### **6. The Handling of Personal Data of Employees**

On commencement of employment, employee personal details and bank account details are emailed to the Treasurer by the Site Manager. The data is transferred to the payroll software and the online bank account. The email is then deleted and no hard copy of the information is retained. When an employee ceases employment, the payroll data is retained (within the software) for six years after the end of the relevant company year end to comply with HMRC requirements. The employee's bank details are deleted from the online bank as soon as the final wages payment is made.

#### **7. The Controller of Information**

The Lakeview Village Hall Ltd is both data controller and data processor. Data control is exercised by the Board of Directors collectively while the Treasurer and the Site Manager process data in relation to hall bookings.

#### **8. The Processor of Information**

In addition to the Treasurer and Site Manager, data processors for data generated within Lakeview Village Hall Ltd include Hallmaster (bookings); Quickbooks Online (accounting matters) and Dropbox (for invoice storing). All three entities have provided us with statements as to their compliance with GDPR requirements.

## **Appendix 1: Information held by the Village Hall**

### **Retained in hard copy:**

Directors: Names, addresses and contact details  
Employees: Nothing  
Service Users: specific details of hirings for purposes of appropriate caretaking provision

### **Retained online:**

Directors Nothing  
Employees Names, addresses, contact details, bank account details  
Service Users: Name, address, contact number and email address; bank account details

### **Information held in respect of Service Users**

1. For all hirers, online booking onto Hallmaster requires the hirer to input their name, address, contact number and email address;
2. For large events such as weddings, the Bookings Officer/Site Manager also saves the hirer's telephone number (not their name) and the date of their hire on the hall's work mobile phone;
3. Details of the hirer's contact number and requirements for the hire are shared by the Site Manager with her team of caretakers and displayed on the working rota;
4. Deposits are generally paid online but are sometimes paid by cash and cheque to the Site Manager;
5. After the event, bank details are requested from the Hirer by the Treasurer for repayment of the deposit.

### **Proposed process for destruction of unnecessary data**

Hallmaster bookings will be reviewed on an annual basis by the Bookings Officer and the Treasurer. If no bookings have been made from that account in the past year, the account and any associated data will be deleted from the system.