**Hyde War Memorial Parish Hall**

**Data Protection and Privacy Policy**

**Who is this for and what does it apply to?**

Data Protection (DP) regulation applies to all organisations that hold and process information that identifies living people. DP/GDPR (General Data Protection Rules) rules do not apply to organisations holding only organisation data with no names attached and do not apply to individuals holding address books or lists on a computer. For Hyde War Memorial Parish Hall (hereafter referred to as the Hall) it does apply to the lists of adults and other people held in a structured way for their future contact. It applies to all sub-committees of the Hall including the 100 Club, Frogham Fair, Produce Show, LINK lunches, the Entertainments Committee, and the Hall’s operations e.g., cleaners, gardeners, and duty officers. It applies to information gathered from the Hall website, from Frogham Fair’s Facebook site to activity information and fundraising lists information. It does not apply to incidental naming of people in for example minutes of meetings or action lists.

**Commitment**

The Hall trustees, committee members and volunteers are committed to fully complying with DP rules. This means that every person (trustees, committee members, duty officers and volunteers) will fully comply with this policy.

**Formal Contact**

The Hall is the Data Controller. The contact address is The Chairperson, Hyde War Memorial Parish Hall, Blissford Hill, Frogham, Nr Fordingbridge SP6 2HS.

The Hall processes personal data using paper and electronic systems. It works with Partner organisations such as Google, Microsoft, Dropbox, and Meta. Local partner organisations include Hyde Parish Council, Hyde Neighbourhood Watch, and local suppliers of services. The Hall has determined that the partner organisations processing data on its’ behalf are compliant with GDPR as far as it can determine.

**The Legal Basis of our Data Processing**

The Hall is a registered charity (number 301827) managed by a Board of Trustees with several sub-committees made up of volunteers and Members of the Hall’s 100 Club. It serves the parish and community of Hyde and other users of the Hall. It processes the data of those adults and children involved in Hall activities and of the Hall’s suppliers.

To achieve the purposes of the charity we process data for our legitimate interests.

These include processing for the purposes of:

* Governance
* Safety and safeguarding
* Fundraising and Public/Community Relations
* Administration of the Hall’s Programme of Activities

This includes processing by holding paper and electronic records, processing with the facilities of our data processing partners and sending communications by paper and electronic means.

We also process data for legal reasons.

This includes for the purposes of:

* Maintaining safety records in compliance with Health and Safety and Insurance legislation
* Maintaining accounting records as required by HMRC and charity regulation
* We process data by reason of data subject’s consent.

This includes for the purposes of:

* Providing information to the community about the activity programme
* Providing information necessary and relevant to governance, administration and fundraising.

**Special Categories of Personal Data**

Under GDPR definitions no Special Categories of data are stored or processed.

The personal data of Trustees, Members and volunteers includes full name and contact details. Members and Volunteer’s preferences regarding activities is recorded. Relevant records are kept for the Management of Safety and Safeguarding.

Website, Facebook and official email information will be kept for effective management of the websites and effective communications.

Financial information about bank accounts, payment of membership and activity fees, donations and the processing of gifts will be maintained as required by regulations.

**Sharing of your Personal data Subject to DP regulations**

The Hall will share your data to comply with legal requirements when necessary or others when we have your consent. It will be shared when relevant to support good administration and security of the charity. It will be processed by partner data processors including cloud-based services for the good administration of the charity and achievement of its’ charitable purposes. Personal data may be transferred outside the UK and EEA (European Economic Area) through the use of cloud computing systems.

**Safeguarding Policies**

The Hall is compliant with safeguarding policies. Information will be passed to the Police when there is a relevant concern.

**Subject Access**

Any person who is the subject of personal data held by the Hall may make a **Subject Area Request** (SAR) by contacting: The Chairperson, Hyde War Memorial Parish Hall, Blissford Hill, Frogham, Nr Fordingbridge, Hampshire, SP6 2HS. The request will be processed in accordance with current regulation.

**ICO Registration**

As a charity the Hall handles personal data only for the purposes of maintenance of its Trustees, Members (100 Club) and volunteers. It is therefore not required to notify the Information Commissioners Office (ICO) or to pay the Data Protection fee.

**Your Rights Under the data Protection Regulation**

Your rights are as follows:

**To be informed about how we process your personal data**; this Data Protection and Privacy Policy seeks to provide that information.

**To have your personal data corrected**: the Hall requests that all Trustees, Members, and volunteers notify any changes immediately which will be updated without delay.

**To object to processing**: The Hall will comply with your request as far as possible, some records are maintained for the formal administration of the charity, for safety and safeguarding purposes when retention of records will be required.

**To restrict processing**: the Hall will comply with your request as far as possible.

**To have your personal data erased:** the Hall will comply with your request as far as possible.

**To request access to your records:** the Hall will comply with current regulations.

**To move, copy or transfer your personal data:** the Hall will comply with your request as far as possible.

**Questions about Data Protection or the use of Personal Data**

Any questions or comments about data protection or this policy, notwithstanding your rights above should be addressed to: The Chairperson, Hyde War Memorial Parish Hall, Blissford Hill, Frogham, Nr Fordingbridge, SP6 2HS.

**Administrative Procedures in Hyde War Memorial Hall (and its’ sub-committees)**

All Trustees and leaders with access to personal data will be trained in Data Protection. This will include reading this policy and may include attending other relevant training. Everyone with access to personal data must commit to comply fully with the policy and to raise any concerns with the Hall Trustees) or Data Protection Officer (DPO) if one is appointed.

All Trustees, Members and volunteers will only use personal data for the achievement of the Hall’s charitable purposes and not for any other reason. Personal data will only be accessed and processed by Trustees and volunteers as relevant to their role.

The personal data must not be shared outside the Hall’s organisation except in accordance with the specific conditions of this policy. Trustees and volunteers may only process data on their home laptops and PCs providing it is secure from possible unauthorised access. PCs, tablets, and laptops must be protected by secure passwords, firewalls, and Internet Security. Data will only be placed on portable devices which allow passwords and encryption. When a PC, tablet or laptop is disposed of the hard drive must be fully erased not just deleted. Data must be backed up sufficiently and in compliance with the Hall policies.

Paper based files must be kept secure at home. Files must only be transported when essential and where data security risks have been assessed and management steps put in place.

Any Trustee or lead volunteer leaving their role must pass all relevant information to their successor or the DPO (if appointed) for review and destruction as required. The leaver must delete all data held on personal electronic/storage devices.

**Directories**

The compilation of any directory must have the approval of the Hall Trustees and must only hold information necessary for the purpose. The request for consent must include information about access to or distribution of the directory. The directory must be kept up to data by a named person or persons.

**Retention of Records**

Records will be retained for good administration and operation of the Hall. Records will be held as follows:

* For governance – indefinitely
* For accounting purposes – to comply with HMRC requirements
* Attendance records for volunteers for safety, safeguarding and insurance purposes – indefinitely

**Consent for Children**

Consent for children (under 18’s) to receive communications will require parental/guardian consent. The Hall has appointed a Trustee as its Child Protection Liaison Officer. The contact address is Child Protection Liaison Officer, Hyde War Memorial Parish Hall, Blissford Hill, Frogham, Nr Fordingbridge SP6 2HS.

**Consent to mailings**

Mailings will be sent for notification of events, administration, and governance. Anyone who wishes not to receive such mailings providing it is not a duty can be unsubscribed by advising the Hall DPO.

**Communication of the Policy**

This policy will be placed on the website and is available from the Secretary to the Hall. The contact address is The Secretary, Hyde War Memorial Parish Hall, Blissford Hill, Frogham, Nr Fordingbridge SP6 2HS.

**Review of this Policy**

This policy was first issued in December 2022. The hall trustees are planning to conduct an audit of the holding and use of data in 2023. This policy will be reviewed on completion of the audit and then periodically as any changes in regulations or best practice occur, this will be at least every 3 years.

Issued: 28 December 2022

Author: David Whitehead

Approved on Behalf of Trustees : Dai Morgan