Farr Community Hall
GDPR Privacy Notice

1 Introduction

Farr Community Hall SCIO ("FCH", "we" or "us") is a registered charity (SC050946). We are wholly committed to protecting your personal data and respecting your privacy. This Privacy Notice sets out the basis on which any personal data that we collect from or about you, or that you provide to us, will be processed by us. We may update this Privacy Notice from time to time. FCH's website will carry an up-to-date copy. For the purpose of The General Data Protection Regulation ("GDPR"), FCH is what is known as a "data controller".

2 Data Protection Contact

If you have any data protection queries, please contact the FCH Administrator, who is also FCH's Data Protection Lead, at farrcommunityhall@outlook.com

3 Data Protection Principles

FCH complies with data protection law which states that the personal information we hold about you must be:

a) used lawfully, fairly and in a transparent way
b) collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes
c) relevant to the purposes we have told you about and limited only to those purposes
d) accurate and kept up-to-date
e) kept only as long as necessary for the purposes we have told you about
f) kept securely.

4 Why we need your data and "Lawful Basis"

The object of FCH, as stated in its Constitution, is

> "To provide facilities in the interest of training, education and social welfare for recreation and leisure activities in the community of Strathnairn with the object of improving conditions of life for people dwelling in Strathnairn and the surrounding area. In the furtherance of these objectives to establish, maintain and manage a community hall in co-operation with the local authority and it successors in office and with community associations and relevant agencies in the area."

We need to know and retain your personal data in order to provide you with the service which you expect from us, i.e. to hire/utilise FCH, including (if applicable),

updates on matters relating specifically to FCH and the hire thereof. This includes your name, address, e-mail address and telephone number(s). We will not collect any personal data from you which we do not need in order to provide and oversee this service to you.

All organisations which hold personal data are required to identify a "Lawful Basis" in order to process personal data. Following an overview of what data is held and why, the lawful basis on which FCH relies is "Contract", i.e. the processing is necessary to enable FCH to provide the service expected by the user/hirer. You are not obliged to provide the personal data in question. However, if you do not allow FCH to process your personal data, you will not be able to use/hire FCH because we will not be able to provide the service you expect from us, i.e. the contract we have with you.

5 What we do with your personal data

Personal data, received directly from you, is held and processed by FCH in order to provide the service to you.

**Needs looked into:*
We use a third party service provider to provide FCH's online diary and booking request system. Personal data may be transferred to the booking page who act for or on FCH's behalf, for further processing in accordance with the purpose(s) for which the data was originally collected or may otherwise be lawfully processed. hallbookingonline.com has contracted with FCH as a data processor under the requirements of GDPR. They are contractually bound only to use personal data for the agreed purpose(s). Relevant persons working for hallbookingonline.com will have access to your personal data under the terms of the data processor contract but only to the extent necessary to perform their services to FCH. Hallbookingonline agrees to implement reasonable contractual and technical protections, to keep your data confidential, not sell your personal data to third parties and not to disclose your personal data to third parties except as may be required by law, as permitted by us or as stated in this Privacy Policy.

In appropriate circumstances, we may disclose data to authorised bodies as required by law.

Other than as described above, no other third parties have access to your personal data and FCH does not share or sell personal data, nor will it be used for marketing or fund-raising activities. In the very unlikely event that FCH wished to use personal data for marketing or fund-raising activities, direct consent would be sought from hirers prior to such activities taking place.

6 How long we keep your personal data

We will keep personal data for as long as is required to provide the service to you and in accordance with statutory requirements and FCH's retention policy of the

booking system which is available on request. Any financial data arising from a transactional process will be held securely by FCH in accordance and compliance with all statutory and HMRC requirements.

7 Your rights

GDPR provides the following rights for individuals (subject to some exemptions):

a) The right to be informed (implicit in this Privacy Notice);
b) The right of access to the personal data that we hold about you;
c) The right to rectification of personal data held about you;
d) The right of erasure of personal data held about you (also known as “the right to be forgotten”);
d) The right to request restriction of processing about you;
e) The right to object to processing;
f) The right to data portability: and
g) Rights in relation to automated decision-making and profiling.

If we receive a request in accordance with the above rights, we will respond within 30 days of the date of receipt of the request. You should note that, if you request that FCH restricts the processing of data about you or you wish to object to processing, you will not be able to use/hire FCH in future. No personal data is processed by FCH for automated decision-making or profiling.

If you wish to raise a complaint on how we have handled your personal data, you can contact FCH’s Data Protection Lead using the details in section 2 above.

If you are not satisfied with our response or believe that we are not processing your personal data in accordance with the law, you can complain to The Information Commissioner’s Office (“ICO”), full contact details for which can be found at https://ico.org.uk/global/contact-us/.

January 2025