

Privacy Policy

What is the purpose of this notice?

Kelsey Hall Management Committee (hereafter referred to as KHMC) is committed to protecting the privacy and security of your personal information.

This privacy notice and privacy policy describes how we collect and use personal information about you during and after your relationship with us, in accordance with the General Data Protection Regulation (GDPR).

KHMC is a “data controller”. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this policy.

This notice applies to current and former customers, hall users, suppliers, contractors and other third parties. This notice does not form part of any contract to provide services. We may update this notice at any time.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

Data protection principles

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We will collect, store, and use the following categories of personal information about you including, but not limited to, the following:

- Personal contact details such as name, address, telephone numbers, and personal email addresses.
- Age and date of birth.
- Bank information
- Your navigation on our website
- Your transaction history

There are “special categories” of more sensitive personal data which require a higher level of protection, but we do not envisage that we will hold or process special categories of sensitive personal data.

How is your personal information collected?

We collect information from you directly in hard copy or email format, or from any forms completed and submitted by you to us via our website and our other information technology systems, e.g. social media websites and instant messaging systems.

How we will use information about you

Under data protection law, we can only use your personal data if we have a proper reason for doing so, for example:

- to comply with our legal and regulatory obligations;
- for the performance of our contract with you or to take steps at your request before entering into a contract;
- for our legitimate interests or those of a third party; or
- you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

Marketing/Promotional communications

We may use your personal data to send you updates (by email, text message, telephone, post or social media) about our products that might be of interest to you including exclusive offers, promotions or new products.

We have a legitimate interest in processing your personal data for promotional purposes. This means we do not usually need your consent to send you promotional communications. However, where consent is needed, we will ask for this consent separately and clearly.

We will always treat your personal data with the utmost respect and never sell OR share it with other organisations outside of KHMC for marketing purposes.

You have the right to opt out of receiving promotional communications at any time by following the opt-out links on marketing material or by contacting us by post or email by contacting us at info@kelseyhall.org.uk

We may ask you to confirm or update your marketing preferences if you instruct us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our operations.

Retention Policy / How long your personal data will be kept

This policy sets out how long information will normally be held by us and when that information will be confidentially destroyed.

We will keep your personal data after we have finished working with you. We will do so for one of these reasons:

- to respond to any questions, complaints or claims made by you or on your behalf;
- to show that we treated you fairly;
- to keep records required by law.

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements, and will not retain your data for longer than necessary.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer a customer or service user we will retain and securely destroy your personal information in accordance with applicable laws and regulations.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for legal, regulatory and tax purposes.

All information must be reviewed before destruction to determine if there are special factors that mean destruction should be delayed, for example:

- potential litigation
- complaints
- ongoing cases

We will endeavour to delete hard copy and electronically held documents and information at the end of the retention period, which is up to seven years.

If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you, or we may be prevented from complying with our legal obligations.

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Data sharing

We will never sell any of your data to a third party. We may, however, have to share your data with third parties to enable us to provide our services to you, such as:

- third-party service providers such as our website host and platform provider,
- third parties to enable and enhance our services to you,
- professional advisers such as our lawyers, marketing agencies and others who help us run our charity,
- law enforcement agencies and fraud prevent agencies,
- social media websites.

We require that third parties respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the EU. If we do, you can expect a similar degree of protection in respect of your personal information.

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information. We do not allow our

third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

We may also need to share your personal information with a regulator such as the Charity Commission or to otherwise comply with the law.

Data security

We have put in place measures to protect the security of your information.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Your rights

You have the following rights, which you can exercise free of charge:

Access – The right to be provided with a copy of your personal data (the right of access).

Rectification – The right to require us to correct any mistakes in your personal data.

To be forgotten – The right to require us to delete your personal data – in certain situations.

Restriction of processing – The right to require us to restrict processing of your personal data – in certain circumstances, e.g. if you contest the accuracy of the data.

Data portability – The right to receive the personal data you provided to us.

To object – The right to object to our continued processing of your personal data, e.g. processing carried out for the purpose of our legitimate interests.

To withdraw – Where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact KHMC at info@kelseyhall.org.uk Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

For further information on each of those rights, including the circumstances in which they apply, please visit the [ICO website](#).

If you would like to exercise any of those rights, please [contact us](#) to let us know what right you want to exercise and the information to which your request relates.

We will need to verify your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will replace it with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about this privacy notice, please contact KHMC at info@kelseyhall.org.uk

How to complain

We hope that we can resolve any query or concern you may raise about our use of your information.

The [General Data Protection Regulation](#) also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns> or telephone: 0303 123 1113.

How to contact us:

Our preferred method of contact is by email to info@kelseyhall.co.uk if you have any questions about this privacy policy or the information we hold about you.

You may also write to us at: Kelsey Hall, Chalk Road, Ifold, RH14 0UD.

