

Nutfield Memorial Hall

GDPR Policy Statement

1. **Nature of work:** We are local group of Trustees formed to operate the Nutfield Memorial Hall. The overall purpose is to provide a meeting venue for local organisations, clubs, societies and individual groups within the local community.
2. **Reasons & purposes for processing information:** We process personal information to enable us to administer our client hall hirers' records and activities including fundraising; maintain our own accounts and records; support and manage our staff and volunteers.
3. **Type & classes of information processed:** We process information relevant to the above reasons/purposes. This may include:
 - a. personal details, including name, title, address, telephone, email and other electronic contact and payment information
 - b. Company details of contractors and suppliers.
- 3.1 **Who the information is processed about:** We process personal information about our staff and volunteers, contractors, clients hiring the hall, supporters and sponsors.
- 3.2 **Who the information may be shared with:** We sometimes need to share the personal information we process with the individual themselves and also with other organisations. Where this is necessary, we are required to comply with all aspects of the Data Protection Act (DPA). We do not keep lists for general marketing purposes.

The four main areas of communication we deal with are:

- a. The trustees themselves, who consent to the above information being kept about them. These are 'consenting' parties.
- b. Our clients who hire the hall, both hirers for current and future bookings and previous hirers who may re-book the facilities in the future. This is 'consent' as set out in the booking conditions and 'implied consent' for contacting hirers and past hirers about future bookings and events.
- c. Our suppliers and contractors who help us maintain the building and services. These are 'contracting' parties.
- d. Our sponsors and grantors and mandatory parties who we routinely contact to finance or otherwise contribute to our functions or that we have to report to, such as HMRC and the Charity Commissioners. These are 'legitimate interest' parties.

Where necessary or required, we share information with family, associates and representatives of the person whose personal data we are processing.

3.3 Transferring information overseas: We do not transfer any personal information outside the European Economic Area (EEA).

4. Other Responsibilities

4.1 Opting out of communications: A process is in place so that individuals can be removed from any mailing list immediately if they request to do so. This is the responsibility of the Booking secretary, who maintains a manual list. The Booking Secretary maintains a list of the names and telephone number of the casual and regular users of the Nutfield Memorial Hall which is amended as necessary; general correspondence from the Secretary is also on the computer.

4.2 The right to be forgotten: On request, information will be deleted by the Booking Secretary and/ or relevant trustee/s. This will be completed within the specified timescales. This is subject to legal requirements for retention such as for finance and tax record purposes. The backup files will likewise be amended or updated.

Anything relating to financial or contractual matters will be kept for 7 years, or as long as a contract is active. This legal basis would take precedence over the request of the individual. However, where we have an individual's bank details for the refund of a deposit, we delete these immediately.

4.3 Subject access requests: Individuals will be able to ask what personal data is being held relating to them and for what purpose. In the event that this is requested then the request will be responded to within one month.

4.4 Access to Data: Access to the booking, finance, contractor and supplier information is restricted to the Trustees.

APPENDIX 1: GDPR – Data Audit Process

This process applies to all forms of data kept the Trustees to regulate and manage the use of the hall.

1.	What data do we collect?	<ul style="list-style-type: none"> • Name • Email address • Postal address • Phone number/s
2.	Where do we store the data?	<ul style="list-style-type: none"> • On a personal computer and some manual records at the point of booking
3.	Who will have access to the data and for what purpose?	<ul style="list-style-type: none"> • Booking Secretary to maintain client booking list, schedules, queries • Booking Secretary and/ or Trustees for financial operations and records including charity commissioners
4.	How do we protect the data we have?	<ul style="list-style-type: none"> • Password protected computer • Any printed documents are not left unsupervised • Lockable drawer/ filing cabinet
5.	How long do we plan to keep the data and what is our justification?	<ul style="list-style-type: none"> • Client booking records for up to 2 years from last booking • Financial records are stored for 7 years
6.	Do we have a reason for every piece of data we collect?	<ul style="list-style-type: none"> • All data (as per section 1 above) is kept for booking and invoicing arrangements and on occasion for pro-active contact in case of eg emergency
7.	What is the process if someone asks to be removed from our records?	<ul style="list-style-type: none"> • The individual will be removed from any lists and correspondence by the Booking Secretary

January 2022