

# **NEWTON AND BYWELL COMMUNITY TRUST**

## **Reg. Charity No. 1167253**

### **PRIVACY STATEMENT**

#### **1. Introduction**

Newton and Bywell Community Trust is committed to protecting and respecting the privacy of personal data. Being transparent and providing accessible information to individuals about how we use personal data is a key element of the Data Protection Act 1998 (DPA) and the EU General Data Protection Regulation (GDPR).

The purpose of this privacy notice is to help you understand what we do with any data you provide and how we process and protect it.

Under the GDPR we do not have a statutory requirement to have a named Data Protection Officer. For Newton and Bywell Community Hall, the Data Controller is the management committee of the Community Hall. If you have any questions regarding your personal data please contact [info@newtonand-bywell.org](mailto:info@newtonand-bywell.org)

#### **2. The Data We Collect and How We Use It**

The data we process falls into 4 main categories:

##### **Bookings Data.**

This is name, address, telephone number and email address as supplied by the prospective hirer via the booking request. The data is collected via the Booking Agreement Forms and used to ensure effective communication throughout the booking process, from initial request through to invoicing and banking of payment. Bookings data details are recorded against your booking on the Hallmaster booking system which is available to view by the general public. When you make your booking you may select one of the following levels of security which is appropriate to you.

Private – shows as a private event on the calendar with no access to the details by the public apart from the timings.

Public with contact details hidden – Shows all booking details on the public calendar (eg Yoga class) but hides the contact details of the booker.

Public – booking and contact details are shown on the calendar. This is ideal for promoting your class or event. The lawful basis for processing this data is

that we are entering into a Contract with you for the hire of the facilities you wish to book.

### **Email Distribution List for Newsletter and parish communications**

This is name and email address only. The distribution list is used to notify recipients of events and information relating to the village hall and the Parish. The email address is on our distribution list only if there has been explicit consent to subscribe. The lawful basis for processing this data is Consent.

### **Trustee Data.**

This is name, address, telephone number, email address and date of birth. We are required by law to notify the Charity Commission of these details of the trustees. It is also necessary for there to be effective communication between trustees. The lawful basis for processing this data is therefore twofold. Firstly, there is the Legal Obligation of keeping details up to date with the Charity Commission. Secondly, there is Legitimate Need for effective communication between committee members.

### **Supplier Data.**

This is name, address, telephone number and email address as provided by the supplier or as obtained from publicly available sources (e.g. internet, telephone directory etc.). The information is used to help communicate with appropriate suppliers for the purchase of good or services. The lawful basis for processing this data is that we are preparing to enter into a Contract for the purchase of those goods and services.

## **3. How We Store Your Personal Data**

Paper based data (e.g. Trustee declaration forms, signed Booking Agreement Forms, etc.) is held in files by the Trustee responsible for the processing of that particular data. The data is in locked premises.

Electronic based data is only stored and accessed using password protected computers/devices.

The Community Hall has a website [newtonandbywell.org](http://newtonandbywell.org). The email distribution list for Newsletter communications is a contact group held within the website using Mailpoet. The Community Hall also uses dedicated email addresses for communication with hirers and website users, and to facilitate

sharing of information within the committee (e.g. Booking Secretary and Chairman have joint access to the Bookings Data).

The Community Hall committee makes extensive use of email to communicate with each other, with suppliers, with volunteers, with hirers, etc. Email requires the use of 3rd party email services and, as part of this, there is use of 3rd party 'cloud' storage.

All email accounts are password protected and email and cloud storage service providers themselves have very strict data protection policies and highly secure IT hardware and infrastructure.

#### **4. How Long We Retain Your Personal Data For**

Bookings data provides support for financial transactions so will be retained for 7 years in order to comply with financial audit requirements. After that point, it will be destroyed/deleted.

Email addresses in the email distribution list will be kept on the distribution list until the data subject requests that their email address be removed.

Trustee data is a legitimate historical record of the Charity so will be retained indefinitely.

Supplier data will be retained until the committee considers the supplier to no longer be considered for future provision of goods or services.

#### **5. Who We Share Your Personal Data With**

We do not, and will not sell any personal data.

We will only disclose information to third parties or individuals when obliged to by law, for purposes of national security, taxation and criminal investigations, and the following situations.

- Bookings data may be shared with another Trustee, where bookings involve licensable activity, as approval of 2 Trustees is required in order for a booking to make use of our Premises Licence.
- Trustee data is shared with the Charity Commission as this is a legal requirement.
- As stated in section 3, some documentation is held in 'cloud' storage. This is sharing in a purely technical sense as those services are delivered by 3rd parties and requires data to be held, at least temporarily, on their servers. The data is still private as this technical sharing does not give permission for those providers to read/access the data held.
- Where you have expressly given your consent for the information to be shared.

## 6. Your Rights

You have a number of very important rights. These include;

- The right to be informed about what data is collected and how it is used, stored, etc. - this Privacy Notice is itself a key part in that.
- The right to ask us to remove your personal data from our records (unless it is necessary for us to continue to use the data for a lawful reason).
- The right to have inaccurate data rectified.
- The right to request a copy of the information we hold about you.

There is more information about your rights at the Information Commission Office at this link:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

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