

Woodchurch Memorial Halls GDPR Privacy Notice

1 Introduction

Woodchurch Memorial Halls (“WMH”, “we” or “us”) is a registered charity, number 1194883. We are wholly committed to protecting your personal data and respecting the privacy of personal data. 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. WMH's website will carry an up-to-date copy. For the purpose of The General Data Protection Regulation (“GDPR”), WMH is what is known as a “data controller”.

2 Data Protection Contact

Under the GDPR we do not have a statutory requirement to have a named Data Protection Officer. For WMH the Data Controller is the management committee of WMH.

If you have any data protection queries, please contact the WMH Management Committee at woodchurchmemorialhall@gmail.com.

3 Data Protection Principles

WMH 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"

We need to know and retain your personal data in order to provide you with the service which you expect from us, ie to hire WMH, including (if applicable) updates on matters relating specifically to WMH 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 WMH relies is “Contract”, ie the processing is necessary to enable WMH to provide the service expected by the hirer. You are not obliged to provide the personal data in question. However, if you do not allow WMH to process your personal data, you will not be able to hire WMH because we will not be able to provide the service you expect from us, ie 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 WMH in order to provide the service to you.

We use a third party service provider called “Hallmaster” to provide WMH’s online diary and booking request system. Personal data may be transferred to Hallmaster, who act for or on WMH’s behalf, for further processing in accordance with the purpose(s) for which the data was originally collected or may otherwise be lawfully processed. Hallmaster has contracted with WMH 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 Hallmaster 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 WMH. Hallmaster 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.

Bookings in the Hallmaster diary are available for everyone to see. The amount of contact information displayed depends on the option selected in the 'Privacy' field when making a booking. Your booking details can be displayed as one of the following:

'Private' – We use this for all one-off bookings for parties, Christenings, baby showers etc. The booking is displayed as 'Private Booking'. No contact details are displayed unless a different Privacy option is selected or requested by you.

'Public - Contact Details Hidden' - We use this for all club, societies, groups ,fitness classes and public events. The booking is displayed with the name of the event only. No contact details are displayed unless a different Privacy option is selected or requested by you.

'Public' which shows the name of your event, your customer name, email address and phone number. These are the contact details that you input when you register as a Customer in Hallmaster. If you would like us to use the 'Public' option for your booking, either select 'Public' in the Privacy field when you make a Booking Request or let us know by emailing us.

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

WMH hall has a Google account used primarily for Gmail. WMH Gmail account also provides some 'cloud' storage in a Google Drive. Some documentation is held on Google Drive to facilitate sharing of information within the committee.

WMH committee make 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 at least transient use of this 3rd party 'cloud' storage.

The Google Drive account and all email accounts are password protected. Google and other email and cloud storage service providers themselves have very strict data protection policies and highly secure IT hardware and infrastructure.

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 WMH does not share or sell personal data, nor will it be used for marketing or fund-raising activities. In the

very unlikely event that WMH wishes to use personal data for marketing or fund-raising activities, direct consent would be sought from hirers prior to such activities taking place.

6 Use of cookies

The WMH and Hallmaster websites uses cookies to improve the user's experience while visiting the website. Where applicable this website uses a cookie control system allowing the user on their first visit to the website to allow or disallow the use of cookies on their computer / device. This complies with recent legislation requirements for websites to obtain explicit consent from users before leaving behind or reading files such as cookies on a user's computer / device.

Cookies are small files saved to the user's computers hard drive that track, save and store information about the user's interactions and usage of the website. This allows the website, through its server, to provide the user with a tailored experience within this website.

Users are advised that if they wish to deny the use and saving of cookies from this website on to their computers hard drive they should take necessary steps within their web browser security settings to block all cookies from this website and its external serving vendors.

This website uses tracking software to monitor its visitors to understand better how they use it. This software is provided by Google Analytics which uses cookies to track visitor usage. The software will save a cookie to your computers hard drive in order to track and monitor your engagement and usage of the website but will not store, save or collect personal information. You can read Google's privacy policy here for further information [<http://www.google.com/privacy.html>].

Other cookies may be stored to your computer's hard drive by external vendors when this website uses referral programs, sponsored links or adverts. Such cookies are used for conversion and referral tracking and typically expire after 30 days, though some may take longer. No personal information is stored, saved or collected.

7 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 WMH's retention policy which is 7 years.

Bookings data provides support to 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.

8 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");
- e) The right to request restriction of processing about you;
- f) The right to object to processing;

- g) The right to data portability: and
- h) 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 WMH restricts the processing of data about you or you wish to object to processing, you will not be able to hire WMH in future. No personal data is processed by WMH for automated decision-making or profiling.

If you wish to raise a complaint on how we have handled your personal data, you can contact WMH Management Committee 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/>.

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