

# Comberton Village Institute Trust

Charitable Incorporated Organisation 1189495

## Data Protection Policy

The inappropriate release of Personal Data can cause harm or distress to individuals. This policy is designed to minimise the risk of such release happening and to ensure that the reputation of the Trust is not damaged through improper use of Personal Data

### 1. What is Personal Data?

Personal Data relates to information about living individuals which enables them to be identified – e.g. names, addresses, telephone numbers, email addresses, bank account details, photographs, video recordings, etc. It does not apply to information about organisations, companies and agencies. This does not mean that someone's name on its own in a document constitutes Personal Data. However, the combination of various data elements such as a person's name and salary or religious beliefs etc. would be classed as Personal Data, and falls within the scope of the General Data Protection Regulations.

### 2. What Personal Data Do We Collect and Why?

#### Hirers

We require you to provide us with certain necessary personal information when making a Hall booking.

#### Users of services provided in the Hall

Users may provide Personal Data to allow them to be contacted about events staged in the Hall. We retain photographs for publicity purposes of public events held in the Hall. We hold CCTV images of individuals inside and immediately outside the Hall: these images are overwritten after about 3 months and are only viewed in the event of damage to persons or property. Access to the images is restricted both physically and by password.

#### Employees

We hold the necessary personal data allowed by law to allow us to fulfil our duties as employer

#### Donors

We hold information provided by donors to allow us to reclaim Gift Aid for as long as donors are liable for income tax.

#### Trustees and volunteers

Trustees and volunteers share personal details to allow them to contact each other. Bank details are collected where required for the repayment of expenses.

### 3. For How Long Do We Retain Personal Data?

We retain Personal Data for the least time necessary to fulfil our legal obligations, for auditing purposes, and for other purposes to allow us to manage the Hall. We may retain Personal Data for longer periods than required by law if it is in our legitimate business interests to do so.

### 4. What Do We Do With Personal Data?

We collect, amend, handle, store or disclose Personal Data in order to manage the operation of the Hall and to comply with all applicable laws and regulations.

## **5. How Do We Share Personal Data?**

We may share your Personal Data or other information about you with Trustees and the Lettings Secretary, third parties who provide accounting and Independent Financial Examination services to us, HMRC and the Charity Commission.

Information that we share with third parties will be the minimum required to allow us to manage the Trust and will be used in accordance with the third parties' privacy practices.

## **6. What Privacy Choices Are Available To You?**

You have choices when it comes to the privacy practices and communications described in this Privacy Policy.

- Personal Data: You may decline to provide Personal Data when we request it but certain or all of our services may be unavailable to you as a result.
- Notices, alerts and updates from us: You may opt out of communications we send.

## **7. What Are Your Rights?**

You have certain rights in respect of your Personal Data. In particular, you have rights of access, rectification, restriction, opposition and deletion and the right to be told how your data is to be used. Please contact us if you wish to exercise these rights.

## **8. How Do We Protect Your Personal Data?**

Data is stored on computers and in paper records held and owned by the Trust, individual Trustees and the Lettings Secretary.

We maintain security measures designed to provide reasonable protection for your Personal Data against loss, misuse, unauthorised access, disclosure and alteration. The security measures include firewalls, data encryption, physical access controls, and access authorisation controls.

Any breach of the General Data Protection Regulations will be reported to the Information Commissioner's Office (ICO) according to their guidelines.

We review stored data and delete that which is no longer reasonably required for our purposes or which is out of date. Outgoing Trustees and volunteers are required to delete or return any Personal Data they may have as a result of their involvement with the Trust.

## **9. Data Protection Officer (DPO)**

The Trustees are collectively responsible for Data Protection.

**Reviewed October 2020**

References:

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

ACRE Information Sheet No 4: Data Protection for Village Halls and Community Buildings