



Holsworthy Memorial Hall

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Registered in England. Company No 5485932 VAT Reg. No. GB881 165122
Registered Charity No 1112980

Data Privacy statement

1. Introduction

Holsworthy Memorial Hall (HMH) 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. This website is not intended for children and we do not knowingly collect data relating to children.

Under the GDPR we do not have a statutory requirement to have a named Data Protection Officer. For HMH, the Data Controller is the Trustees of the Hall. If you have any questions regarding your personal data please contact info@holsworthymemorialhall.co.uk.

2. The Data We Collect and How We Use It

The data we process falls into 3 main categories:

(a) Bookings Data. This is name, address, telephone number and email address as supplied by the prospective hirer via the booking enquiry. The data is collected via the Booking Enquiry Form and used to ensure effective communication throughout the booking process, from initial request through to invoicing and banking of payment. 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.

(b) Trustee Data. This is name, address, telephone number, email address and date of birth. We are required by law to notify the Charity Commission and Companies House 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 trustees.

(c) 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 book, 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 and/or Bookings Clerk. The data is retained securely in a locked cabinet in a non-public location, accessible only by the Bookings Clerk and nominated trustees. All computers with access to personal data will

be password protected. All electronic data held on portable devices (for example laptops and USB drives) will be password protected.

The HMH trustees 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 Hall email account is password protected and accessed by the Bookings Clerk. Google and other 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

Source	Retention Period	Example
Receipts and invoices	Kept for 6 years from the end of the current financial year	Suppliers invoice, invoices for hall bookings
Booking/hirer information (may include some personal information)	Kept for 1 year	Hiring agreements
Committee Meetings and AGM Minutes (may include some personal information)	Stored electronically and in hard copy for an indefinite period, for reference purposes.	Agendas, minutes from meetings, presentations
Trustee, contractor, volunteer information (may include personal information)	Necessary information to be retained for the duration of service	Trustee declaration
Trustee information (may contain trustees' personal information)	May be kept by the Charity Commission	Annual Return, Charity Commission website
Financial donor records (may contain donor's personal information)	Kept for 6 years from the end of the current financial year	Donor correspondence

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 is shared with our Designated Premises Supervisor (DPS) where bookings involve licensable activity as the DPS approval is required in order for a booking to make use of our Premises Licence
- trustee data is shared with the Charity Commission and Companies House as this is a legal requirement
- as stated in section 3 above, 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 (e.g. Google) 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/individualrights/>

7. Third-party links outside of our control

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements.

When you leave our website, we encourage you to read the privacy notice of every website you visit.

If you have any questions regarding your personal data please contact info@holsworthyhall.co.uk or write to:

The Trustees
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