



## Martlesham Community Hall (Registered Charity 1009602)

### DATA PRIVACY NOTICE

We, the Charity Trustees, are committed to respecting your privacy. This notice is to explain how we may use personal data we collect:

- before, during or after a hire (or hires) of our facilities;
- for any other business or personal interaction with us.

#### Introduction

The Data Protection Act 1998 (DPA) and General Data Protection Regulations (GDPR) govern the use of personal information (personal data) in the UK.

Personal data can be held and used on computers, laptops and mobile devices, or on paper. It can include email, minutes of meetings, and photographs.

This notice explains how we comply with data protection law and regulations and what your rights are.

*The term 'processing' in this document and within the DPA and GDPR includes collecting, recording, organising, structuring, storing, adapting or altering, retrieving, consulting, using, disclosing by transmitting, disseminating or otherwise, aligning or combining, restricting access to, or erasing or destroying personal data.*

Martlesham Community Hall, also referred to as 'we' and 'us' in this document, is an unincorporated not-for-profit organisation registered as a Charity in England & Wales. The organisation exists to provide community meeting room spaces for hire, primarily for leisure and community activities, primarily (but not exclusively) for individuals and organisations within Martlesham Parish.

The Charity (the Trustees collectively) is the Data Controller for any personal information held. Trustees, staff (including contractors where applicable) and volunteers are personally responsible for processing personal information in accordance with the DPA and GDPR. Trustees, staff/contractors and volunteers who have access to personal information will therefore be expected to read and comply with this policy.

We have not appointed a Data Protection Officer to oversee our compliance with data protection laws and regulations, as we are not required to do so.

Please contact the Management Committee with any queries or requests relating to personal data – see Contacting Us at the end of the document for contact details.



## Personal data we may collect from you

Depending on the type of relationship you have with us, we may obtain the following personal data about you:

- Personal contact details:
  - Hirers, Management Committee Members and Others - name, title, address, email address(es) and telephone number(s);
  - Trustees - as above, plus date of birth (for Charities Commission register).
- Records of your interactions with us, such as telephone conversations, emails and other correspondence and instructions to us;
- Use of our website(s), including user names, email addresses, passwords, IP addresses, and other system identifying information;
- Use of our Wi-Fi Internet access system – including recording of device and user information;
- Records of you attending the facilities managed by and/or at events hosted by us;
- Images in video and/or photographic form and voice recordings;
- identification documents, such as passport and identity or security pass cards.

## The uses we make of your information

The table below describes the main purposes for which we process your personal data, the categories of your information involved and our Lawful Basis for doing this.

‘Needed’ in the Lawful Basis column means we are holding your data on a 'legitimate interest' basis. i.e. it's needed to administer hirer and other relationships with us.

PURPOSE	Applies To	Personal data USED	Lawful basis
To deal with any queries and requests you direct to us about hire availability and conditions.	Hirers and Potential Hirers	Contact details.  Records of your interactions with us	Needed for us to effectively communicate with you and to record your queries and requests.
To arrange, manage and charge for any hire or hires of the facilities.	Hirers	Contact details.  Records of your interactions with us	Needed for us to properly administer and provide the facilities hire(s) you have agreed to and to send request(s) for payment.
To administer the Charity	Trustees/ Management Committee	Contact details, including date-of-birth for Trustees  Other personal information in agendas, minutes and other meeting and related	Needed for the Trustees and Management Committee to administer the Charity effectively and comply with legal and regulatory reporting requirements.



		administrative information.	
To answer your complaints or to address any other issues you have brought to our attention.	All	Contact details.  Records of your interactions with us.	Needed to provide effective complaint handling and issue resolution.
To secure our IT systems (including website and Wifi Internet access)	All	Contact details, if applicable  Your usage of: <ul style="list-style-type: none"> <li>• Our website, email and other Internet-based storage and systems in use.</li> <li>• Wifi Internet Access within our facilities.</li> </ul>	Needed to ensure that our IT systems are secure and are being used appropriately.

We will only hold and process your personal data for the necessary administrative purposes detailed above. If you do not provide us with the requested personal data or withdraw your consent for us to use it, we may not be able to continue with our hire contract(s) or other relationships with you.

### Disclosure of your Personal data

We may share personal data with the following parties:

- Any party explicitly approved by you – i.e. with your explicit consent only;
- The Government or regulators: where we are required to do so by law or to assist with their investigations or initiatives. \*
- Police, law enforcement and security services: to assist with the investigation and prevention of crime and the protection of national security. \*

\* = For clarity - this includes any disclosure required by COVID-19 related or other public health legislation.

We will never sell or otherwise divulge any of your personal data to commercial or other third-parties unless listed above.



### Transferring your Personal data internationally

The personal data we collect may be transferred to and stored in countries outside of the UK, the European Union (EU) or the European Economic Area (EEA).

Some of these jurisdictions require different levels of protection of personal data and, in certain instances, the laws in those countries may be less protective than in the UK. We will take all reasonable steps to ensure that your personal data is only used in accordance with this privacy notice and applicable data protection laws and is respected and kept secure. Where a third party processes your data on our behalf, we will put in place appropriate safeguards as required under UK data protection laws.

### How long we keep Personal Information Data for

The time we keep your personal data for will differ depending on the type of information and the reason why we collected it from you. In some cases personal data may be retained on a long-term basis: for example, personal data that we need to retain for legal purposes will be retained in accordance with usual commercial practice and regulatory requirements.

Generally, where there is no other legal requirement, we may retain all physical and electronic records for a period of up to **six years** after your last hire or other contact with us. Exceptions to this rule are:

- CCTV records, which are held for no more than 30 days unless we need to preserve the records for the purpose of prevention and detection of crime;
- Information that may be relevant to personal injury or discrimination claims may be retained until the limitation period for those types of claims has expired. For personal injury or discrimination claims this can be an extended period, as the limitation period might not start to run until a long time after the event.

### Your Responsibilities

It is important that the personal data we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you change your phone number or email address. Please contact us with your updated information using the Contacting Us details at the end of the document.

### Your rights in relation to your Personal data

You have the following rights relating to your personal data:

- the right to be informed about how your personal data is being used;
- the right to access the personal data we hold about you;
- the right to request we correct inaccurate personal data we hold about you;
- the right to request we erase your personal data in certain limited circumstances;
- the right to restrict us processing your personal data where certain requirements are met;
- the right to object to the us processing your personal data;



- the right to request we transfer elements of your data either to you or another service provider; and
- the right to object to certain automated decision-making processes using your personal information.

Some of these rights, for example the right to require us to transfer your data to another service provider or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which apply to them and they may not apply to personal data recorded and stored by us. For example, we do not use automated decision making in relation to your personal data. However, some have no conditions attached, so your right to withdraw consent or object to processing for marketing and promotion are absolute rights.

### General

Whilst this privacy notice is a general summary of your legal rights regarding your personal data, this is a very complex and evolving area of law. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us – see Contacting Us at the end of the document for contact details.

If you are concerned with the way we are using your personal data you can also complain to the UK Information Commissioner's Office or your local data protection regulator. However, we are here to help and we encourage you to contact us to resolve any complaint first.

### Changes to this Privacy Notice

We may update this privacy notice from time to time. When we change this notice in a material way, we will update the version date at the bottom of this page. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal data.

### Contacting Us

In the event of any query or complaint in connection with the information we hold about you, please contact us via our website contact form <https://mchall.org.uk/contact/> (select Message For 'Data Privacy') or write to us at our Charity registered address - 9 York Road, Martlesham Heath, Ipswich, IP5 3TL.

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