

WVHA Privacy Notice

1 Introduction

Westbury Village Hall Association (“WVHA, “we” or “us”) is wholly committed to protecting your personal data and respecting your privacy. 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. The village website will carry an up-to-date copy.

For the purpose of The General Data Protection Regulation (“GDPR”), WVHA is what is known as a “data controller”.

2 Data Protection Contact

If you have any data protection queries, please contact Cathy Knott, Parish Clerk at westburyclerk@aol.com

3 Data Protection Principles

WVHA 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"

The object of WVHA is the provision and maintenance of a village hall for the use of the inhabitants of the Parish of Westbury without distinction of political, religious or other opinions, including use for meetings and classes, and for other forms of recreation and leisure-time occupation, with the object of improving the conditions of life for the said inhabitants”.

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 the hall, including (if applicable), updates on matters relating specifically to WVHA 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 WVHA relies is “Contract”, ie the processing is necessary to enable WVHA 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 WVHA to process your personal data, you will not be able to hire Westbury Village Hall 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 direct from you, is held and processed by WVHA in order to provide the service to you.

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

with WVHA 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 SKEDDA 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 WHVH. SKEDDA 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.

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 WVHA does not share or sell personal data, nor will it be used for marketing or fund-raising activities. In the very unlikely event that WVHA wished to use personal data for marketing or fund-raising activities, direct consent would be sought from hirers prior to such activities taking place.

6 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 WVHA's retention policy which is available on request. Any financial data arising from a transactional process will be held securely by WVHA in accordance and compliance with all statutory and HMRC requirements.

7 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");
- d) The right to request restriction of processing about you;
- e) The right to object to processing;
- f) The right to data portability; and
- g) 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 WVHA restricts the processing of data about you or you wish to object to processing, you will not be able to hire Westbury Village Hall in future. No personal data is processed by WVHA for automated decision-making or profiling.

If you wish to raise a complaint on how we have handled your personal data, you can contact WVHA's Data Protection Lead 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/>

May 2018