Data Protection Policy for Crudwell Village Hall & Recreation Ground charity no.294177

We have updated our Privacy Policy in line with the General Data Protection Regulations (GDPR) which is a new law to protect the privacy of customers and provide transparency on how we use personal data.

The Trustees of Crudwell Village Hall & Recreation Ground (CVHRG) are responsible for ensuring that the Trustees, staff and volunteers working for the Crudwell Village Hall & Recreation Ground charity comply with the Act. The Trustees of CVHRG are collectively the Data Protection Officer (DPO).

The Data Protection Act

This contains eight principles for processing personal data with which we must comply. Personal data:

- 1. Shall be processed fairly and lawfully and, in particular, shall not be processed unless specific conditions are met,
- 2. Shall be obtained only for one or more of the purposes specified in the Act, and shall not be processed in any manner incompatible with that purpose or those purposes,
- 3. Shall be adequate, relevant and not excessive in relation to those purpose(s).
- 4. Shall be accurate and, where necessary, kept up to date,
- 5. Shall not be kept for longer than is necessary,
- 6. Shall be processed in accordance with the rights of data subjects under the Act,
- 7. Shall be kept secure by the Data Controllers who take appropriate technical and other measures to prevent unauthorised or unlawful processing or accidental loss or destruction of, or damage to, personal information,
- 8. Shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal information.

Applying the Data Protection Act within the charity

Correcting data

Individuals have a right to make a Subject Access Request (SAR) to find out whether the charity holds their personal data, where, what it is used for and to have data corrected if it is wrong, to prevent use which is causing them damage or distress, or to stop marketing information being sent to them. Any SAR must be dealt with within 30 days. Steps must first be taken to confirm the identity of the individual before providing information, requiring both photo identification e.g. passport and confirmation of address e.g. recent utility bill, bank or credit card statement.

Responsibilities

The Trustees of CVHRG are the Data Controllers under the Act, and are legally responsible for complying with the Act, which means that they determine for what purposes personal information held will be used.

The Trustees will take into account legal requirements and ensure that they are properly implemented and will, through appropriate management, apply strict application of criteria and controls:

a) Collection and use information fairly.

- b) Specify the purposes for which information is used.
- c) Collect and process appropriate information, and only to the extent that it is needed to fulfil its operational needs or to comply with any legal requirements.
- d) Ensure the quality of information used.
- e) Ensure the rights of people about whom information is held, can be exercised under the Act.

These include:

- i) The right to be informed that processing is undertaken.
- ii) The right of access to one's personal information.
- iii) The right to prevent processing in certain circumstances, and
- iv) the right to correct, rectify, block or erase information which is regarded as wrong information.
- f) Take appropriate technical and organisational security measures to safeguard personal information,
- g) Ensure that personal information is not transferred abroad without suitable safeguards,
- h) Treat people justly and fairly whatever their age, religion, disability, gender, sexual orientation or ethnicity when dealing with requests for information,
- i) Set out clear procedures for responding to requests for information.

All Trustees, staff and volunteers are aware that a breach of the rules and procedures identified in this policy may lead to action being taken against them.

The Trustees will be responsible for ensuring that the policy is implemented and will have overall responsibility for:

- a) Everyone processing personal information understands that they are contractually responsible for following good data protection practice
- b) Everyone processing personal information is appropriately trained to do so
- c) Everyone processing personal information is appropriately supervised
- d) Anybody wanting to make enquiries about handling personal information knows what to do
- e) Dealing promptly and courteously with any enquiries about handling personal information
- f) Describe clearly how the charity handles personal information
- g) Will regularly review and audit the ways it holds, manages and uses personal information
- h) Will regularly assess and evaluate its methods and performance in relation to handling personal information.

This policy will be updated as necessary to reflect best practice in data management, security and control and to ensure compliance with any changes or amendments made to the Data Protection Act 1998.

In case of any queries or questions in relation to this policy please contact the Chairman or Treasurer of CVHRG at chair@cvhrg.org.uk or treasurer@cvhrg.org.uk.

Information Commissioner's Office (ICO) is responsible for implementing and overseeing the Data Protection Act 1998. They can be contacted on 0303 123 1113, https://ico.org.uk/global/contact-us/email or at the ICO, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.