

Eastling Village Hall



General Data Protection Regulation (GDPR) Policy

June 2018

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What is GDPR

The General Data Protection Regulation (GDPR), which came into effect on 25th May 2018, was created to unify the personal data protection rules across the EU, and must be followed by all companies, businesses or other entities that collect personal data in some way. For these entities, GDPR will introduce many additional rules that will affect many areas of the data management process, such as the collection and storage of data processing documentation, monitoring of potential personal data breaches, and involving a supervisory authority in matters such as, for example, the aforementioned data breaches.

The GDPR's main purpose is to enhance the protections that EU citizens have when their data is used and collected, and afford them new rights such as the right to transfer their personal data, or to be forgotten; that is, to have their personal data removed from a system when the law no longer requires its retention. With all of these new regulations comes enforcement, and in order for companies to protect themselves against fines, it is important that they ensure that they protect any collected personal data as effectively as they can.

Whether you are operating a large online store, news portal or just a small personal blog, if you process any kind of data taken from the users who visit your site, then you will be subject to the new regulations. As such, Eastling Village Hall, and its associated Website, are fully covered by GDPR.

Compliance Audit

In order to ensure that the Eastling Village Hall (and its associated Website) complies with the GDPR, an audit was conducted. The following areas were identified as falling within the scope of the GDPR:-

1. Google Analytics is used to collect data to monitor the Website usage and improve its functionality;
2. No cookies are used on the Website (except to enable Google Analytics to function);
3. Details of events and groups are displayed on the public facing calendar;
4. Yearly AGM Minutes are stored on the site;
5. Contact details are included for the various groups who use the Village Hall, and are sometimes included under the Forthcoming Events section;
6. A social media link is included on the Website to the Village Hall Facebook account;
7. Financial information with regards to the finances of the Village Hall is stored/processed;
8. Publicity material, including photos of recognisable people at events, is included on the Website; and
9. Contact information is recorded, both on the Website and in paper records, about Trustees.

All personal data held by the Village Hall has been obtained only for the purposes of managing the hall e.g. recording bookings, managing the finances, invoicing, recording trustee information, etc. No information is shared with others.

Compliance Notes/Actions

A new message will be added to the Homepage of the Website. This will tell users where to find the GDPR Policy on the site. Terms of Agreement for using the Website itself can be found at the bottom of each page.

Google Analytics is used by the webmaster to provide website statistics to the Village Hall Trustees on a regular basis. The data collected is also used to improve visitors' experience by identifying trends and modifying the site to respond to these trends. No individuals are uniquely identified by this process. Google is classed as a 'third party data processor', and has stated they will ensure that their services align with the GDPR. The GDPR policy for Google is outside the scope of this document.

CalendarWiz, the public facing calendar, shows existing bookings for the Village Hall, but does not, in general, show the details of groups and individuals (as this is shown elsewhere). The terms & conditions for using the Village Hall will be updated to inform anyone booking the Village Hall that they explicitly consent to their data being processed and stored in order to facilitate bookings (this also includes contact data kept separately by the Bookings Secretary in order to facilitate the booking of the Village Hall). CalendarWiz is classed as a 'third party data processor', and has stated they will ensure that their services align with the GDPR. The GDPR policy for CalendarWiz is outside the scope of this document.

The yearly AGM Minutes will be reviewed and, in the majority of circumstances, any references to individuals outside of the Village Hall Trustees will be redacted. Information on individuals will only be kept where it is necessary for the lawful purposes of managing the Village Hall.

With regards to contact details for the various groups who use the Village Hall and/or any individual(s) identified within the Forthcoming Events section, these are required for the purpose of managing the hall and, as such, do not require specific consent (but see later with regards to the right for an individual to request their information be removed and the right to be forgotten).

The Website also has a link to the Eastling Village Hall Facebook site. The link allows the user to move to the Facebook site only. Facebook is classed as a 'third party data processor', and has stated they will ensure that their services align with the GDPR. The GDPR policy for Facebook is outside the scope of this document.

Financial information will only be processed/stored (not on the Website) for the purposes of meeting the Village Hall's statutory financial obligations. As such, specific consent is not required for any data held (but see later with regards to the right for an individual to request their information be removed and the right to be forgotten). All such information will be stored securely.

Any information that we collect about Hirers is either stored electronically and/or printed/written down and stored in our filing system. The personal information that we hold will be held securely to ensure no unauthorised disclosure or access takes place. Personal details collected for the purpose of processing bookings are retained for one year. After this, all personal information is deleted. We will keep your personal information confidential except to the extent that we are compelled to disclose it by law (for example where fraud or other crime is involved) or to comply with an instruction of a regulatory body of competent jurisdiction.

Explicit permission will be sought as necessary for any publicity material placed on the Website, including photos of recognisable people at events. Group photos, where permission would be difficult/impossible to obtain for all people in the frame, will be removed/not used in future.

Trustee contact information is held for the lawful purposes of managing the hall and, as such, does not require specific consent. Such information will be removed/deleted when they resign from their position.

Whilst the Village Hall is not required to provide a privacy notice as it is only processing data for the purposes of managing the hall's bookings and finances, for the avoidance of doubt, the following privacy notice will be included on the Website and in the Village Hall Conditions of Use:-

"Eastling Village Hall uses personal data for the purposes of managing the hall, its bookings and finances, running and marketing events at the hall, managing volunteers and contractors and its fundraising activities. Data may be retained for up to 7 years for accounts purposes and for longer where required by the hall's insurers. If you would like to find out more about how we use your personal data or want to see a copy of information about you that we hold, please contact the Chair of the Trustees."

Subject Access Requests (SARs)

SARs may be received for a number of reasons:-

1. Confirmation as to whether or not personal data concerning them is being used, where and for what purpose;
2. A request to have data rectified if incorrect or incomplete; and
3. A request to have data erased where there is no compelling reason for it to continue to be held.

Upon the receipt of a SAR, the Village Hall Trustees will first verify the individual's identity. All SARs will be processed within 30 days.

A user may, on request to the webmaster, request that any and all information regarding them, stored on the website, calendar or elsewhere be removed. Such data will not be deactivated or hidden and will be deleted entirely. Whilst a user always has the right to have their data removed at any time, the Village Hall retains the right to refuse to accept bookings should this make it impossible to manage and facilitate the bookings process

Access to Information

In order to update and maintain the Village Hall website, the site webmaster has access to all the data contained on and processed by the Website. The current webmaster is Paul Ainsworth, and he can be contacted at kavallach6@btinternet.com.

The Village Hall Bookings and Calendar data is processed by the Village Hall Bookings Secretary, Hayley Brookland-Beck, who can be contacted on 01795-890176.

Financial information is processed by the Village Hall Treasurer, Simon Brookland-Beck, who can be contacted on 01795-890176.

For any queries relating to data held or processed by the Village Hall, please contact the Chair, Paul Ainsworth, at kavallach6@btinternet.com or, in writing, to The Old Post Office, The Street, Eastling. ME13 0AZ.

The Prevention of, and Reporting of, Breaches

All Trustees will ensure that any PC, laptop, mobile, tablet, CD or memory stick used for village hall purposes is password protected and that if any of these items are stolen or hacked, and risk to individuals results, the breach is reported. The same applies to paper files.

The Chair should also be contacted should any Trustee, Hirer or member of the Public believe that a breach of confidentiality has occurred. Any breach will be reported to the Information Commissioner's Office (ICO) within 72 hours (3 days)

Website Terms of Agreement

Copyright Statement

The copyright of the material on this website belongs to either Eastling Parish Council or the author. All authors give their express permission for publication by their submission of the item to the editor. You are welcome to download any of the material for your own personal use on these terms and conditions:-

- You accept all risks from downloading, installing or using the material.
- Eastling Village Hall will not be responsible for any damage (including any damage caused by viruses) to your computer or software or any losses or damage suffered by you as a result of downloading, installing or using the material;
- You will not, without the prior written agreement of Eastling Village Hall, reproduce, redistribute or alter any of the material; or alter or remove any copyright notices on the material; and

- By downloading, installing or using any of the material you automatically agree to these terms and conditions. If you do not agree to these terms and conditions, then please do not download, install or use any of the material.

All other rights are reserved to Eastling Village Hall. Any infringement of our rights will result in the appropriate legal action.

Liability Statement

Whilst every care is taken in the compilation of the material, content and information contained within this website, and every effort is made to ensure that it is both accurate and up to date, Eastling Village Hall, nor any other party involved in any way with this website, cannot be held responsible for any loss, cost, damage, inconvenience or expense caused through the use of this website or as a result of any inaccuracy or error contained within the website or any information or material displayed on or contained within it.

Virus and Malware Checking

Whilst all reasonable steps have been taken to ensure that this website is free from computer viruses, Eastling Village Hall, nor any other party involved in any way with this website, accepts no liability in respect of any loss, cost, damage, inconvenience or expense suffered as a result of accessing this website or any of its attachments. Please ensure that you take any steps you regard as necessary to protect your computer system from such attack.