

# Hartlebury Parish Hall Privacy and Data Protection Policy

**Dated June 21 2023**

Hartlebury Parish Hall (hereafter referred to HPH) complies with the General Data Protection Regulation (GDPR) law, which came into effect on 25 May 2018 and superseded the Data Protection Act 1998.

HPH is committed to keeping your personal information accurate and up to date. HPH will not keep your information longer than necessary.

This Policy explains how we use your personal information and the ways in which we protect your privacy. This notice applies to all personal data collected for or on behalf of HPH. This includes information collected by letter, email, face to face, telephone or online. This policy should be read in conjunction with the Privacy Policy of the Parish Hall Website which form part of its Terms and Conditions of use: [hartleburyparishhall.co.uk/\\_tos.html](http://hartleburyparishhall.co.uk/_tos.html)

By using our physical site and/or our website, you agree to accept this Policy. This policy may be reviewed from time to time so please check this Policy each time you submit personal data to us.

## **How we use your personal data**

HPH collects and uses your personal data in order to provide you with HPH services.

HPH uses your information for the purposes for which you provided the information: to enquire about events or bookings at HPH, including the delivery of services for you. It also uses this information to monitor its performance in responding to your request.

Your personal information may be used in the following ways:

- to respond to enquiries, you send to HPH
- to co-ordinate the booking process for HPH including sending invoices
- to tell you about services and provide services appropriate to you
- for data analysis to enable us to understand patterns and trends of service usage
- for services and financial planning, to help us create policy and inform decision making e.g. identifying where new facilities/infrastructure are most needed
- to help us to verify your identity if you ask us for services
- to ensure that HPH meets its duties, including those imposed by the Equality Health and Safety Acts and its tax obligations

- where necessary for law enforcement functions e.g. licensing, planning enforcement, trading standards and food safety where HPH is legally obliged to carry out such processing
- to help investigate any concerns or complaints you have/may have about the services you receive where otherwise allowed under the law.

For further information on the General Data Protection Regulation please refer to the Information Commissioner's website.

### **Disclosure of information**

1. Services such as education and social care, protection of vulnerable children and adults, and the support of public health and wellbeing may involve collecting, using and sharing sensitive personal data as defined by law. HPH DOES NOT DISCLOSE OR SHARE SENSITIVE OR CONFIDENTIAL INFORMATION WITHOUT YOUR EXPLICIT CONSENT EXCEPT IN A SMALL NUMBER OF SITUATIONS WHERE DISCLOSURE IS ALLOWED BY LAW, OR WHERE WE HAVE GOOD REASON TO BELIEVE THAT FAILING TO DO SO WOULD PUT YOU OR SOMEONE ELSE AT RISK.
2. HPH is obliged to protect public funds. It may use personal information and data-matching techniques to help detect and prevent fraud and ensure public money is spent in the most appropriate and cost-effective way. In order to achieve this, HPH MAY SHARE INFORMATION WITH OTHER ORGANISATIONS WHICH AUDIT OR ADMINISTER PUBLIC FUNDS. This includes the Audit Commission, other local authorities, HMRC and the Police.
3. HPH may use personal information to IDENTIFY PEOPLE WHO WILL NEED EXTRA SUPPORT DURING EMERGENCIES OR MAJOR INCIDENTS eg emergency evacuation
4. HPH is keen to ensure it is providing the services that are needed and may contact you to make you aware of services or support which could be of interest to you. HPH may invite you to sign up for other services at the same time (for example a regular mailing list). YOU CAN CHOOSE NOT TO ACCEPT THIS INVITATION.
5. HPH may also ask you for feedback on how it is performing or ask for your views on services which you have been using. THIS INFORMATION WOULD THEN BE SHARED INTERNALLY WITH TRUSTEES, HOWEVER, YOU MAY WITHOLD YOUR CONSENT.

### **Limiting disclosure of information**

You may not want HPH to collect or share your personal information. You may choose to set conditions on how your personal information can be used. In these cases, HPH may not be able to provide you with the service you need or may only be able to provide it in a limited way.

Be aware there are STATUTORY OBLIGATIONS THAT HPH MUST CONFORM WITH. In these cases, HPH will not be able to agree to your request. HPH may use ethnic, gender, sexual orientation and age information (ie equalities data) to compile

statistics in order to comply with equality legislation and assist in planning and service provision. Such data DOES NOT identify individuals or affect your entitlement to services.

### **Third parties**

The information HPH collects will not be shared with other Third-Party organisations. HPH will only share your personal information when permitted to or are required to by law or where it has your consent to do so, as required by law. HPH does not pass personal data to other organisations for marketing purposes without your consent. Your personal information may be processed by an external service provider acting on HPH's behalf to provide services.

### **Email**

Emails that HPH sends to you or you send to HPH may be kept as a record of contact. If HPH needs to email sensitive or confidential information to you, HPH will check that it is using the correct email address and may use additional security measures. If you need to send sensitive information HPH recommends using encrypted email or the postal service.

### **Your rights**

1. You can ask HPH to stop processing your personal data in relation to any HPH service. This may delay or prevent HPH from delivering a service to you. HPH will endeavour to meet your request but may be required to hold or process information to meet its legal duties.
2. You are entitled to request access to and a copy of any information HPH holds about you. If you find that the information HPH holds about you is no longer accurate, you have the right to ask for it to be corrected. HPH may not always be able to change or remove the information. However, HPH will correct factual inaccuracies and may include your comments in the records.

### **Deletion of personal data**

HPH will only retain personal data if:

- There is a business need
- There is a legal obligation to
- It is required for historical or archival purposes.

It follows that HPC must:

- destroy papers and electronic data for which there is no continuing business need and send papers that cannot be destroyed to archive for as short a time as possible
- dispose of data and papers securely, keeping a general record of what has been destroyed e.g. emails from hirers from before 2016 were destroyed on a particular date in line with our policy.

## **External links**

HPH's website contains external links to third party sites. This privacy notice applies only to information collected by or on behalf of HPH. If you go to another website, you should read their privacy notice before you give them any personal information. Please refer to the Terms and Conditions of use of our website for further details.

## **Use of Cookies**

HPH's website uses cookies to help accurately estimate the number of visitors to the site and volumes of usage. TOWeb the software used to create HPH's website, automatically deletes cookies from your information after 365 days.

## **Queries and complaints**

If you would like further information or have a complaint about any of the details in this notice, please contact HPH by email or post:

Email: [correspondence@hartleburyparishhall.co.uk](mailto:correspondence@hartleburyparishhall.co.uk)

Write to: Catherine Holden, Chair, Hartlebury Parish Hall Management Committee,  
Hartlebury Parish Hall, Waresley Court Road, Hartlebury, DY11 7TQ

Policy prepared by Elizabeth Davies Secretary to the Committee

Agreed by Committee on 21.6.23