Hanney War Memorial Hall takes your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal information. It also explains your rights in relation to your personal information and how to contact us or supervisory authorities in the event you have a complaint.

We collect, use and are responsible for certain personal information about you. When we do so we are subject to the General Data Protection Regulation, which applies across the European Union (including in the United Kingdom) and we are responsible as 'controller' of that personal information for the purposes of those laws.

#### **Key terms**

It would be helpful to start by explaining some key terms used in this policy:

We, us, our	Hanney War Memorial Hall
Personal information	Any information relating to an identified or identifiable individual

We need your personal data to enable us to provide a village hall for the use of the residents of East and West Hanney. Specifically, we need personal data to:-

- manage and communicate with our Trustees and users;
- manage and maintain the hall;
- to provide details of Hall events and performances to you;
- · for Hall bookings; and
- to meet our statutory obligations (e.g. Charity Commission Returns and HSE).

If you do not provide personal information we ask for, it may delay or prevent us from providing services to you, or in us contracting your services.

## Personal information we collect about you

We may collect and use the following personal information about you:

- your name and contact information, including email address and telephone number and company details if applicable
- · your gender information, if you choose to give this to us
- your billing information

We collect most of this personal information directly from you—in person, by telephone, text or email and/or via our website. However, we may also collect information from publicly accessible sources (eg the internet), directly from a third party (e.g. the Avalon booking system) and from cookies on our website.

#### How and why we use your personal information

Under data protection law, we can only use your personal information if we have a proper reason for doing so, eg:

- for our legitimate interests or those of a third party;
- for the performance of our contract with you or to take steps at your request before entering into a contract;
- to comply with our legal and regulatory obligations;
- · where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests

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The table below explains what we use (process) your personal information for and our reasons for doing so:

What we use your personal information for:-	Our reasons
Updating and enhancing user records	For our legitimate interests or those of a third party, eg making sure that we can keep in touch with our users about events and performances
	For the performance of our contract with you or to take steps at your request before entering into a contract
	To comply with our legal and regulatory obligations
Updating and enhancing supplier / contractor records	For the performance of our contract with you or to take steps at your request before entering into a contract
	For our legitimate interests or those of a third party, eg making sure that we can keep in touch with our suppliers / contractors about future maintenance contracts to the Hall
For the purpose of hire of the Hall and updating and	For the performance of our contract with you or to take steps at your request before entering into a contract
enhancing hirer records	To comply with our legal and regulatory obligations
	For our legitimate interests or those of a third party, eg making sure that we can keep in touch with hirers about booking rates
Marketing our services to existing and former hirers;	For our legitimate interests or those of a third party, ie to promote the Hall to existing and former hirers
Ensuring safe practices and	To comply with our legal and regulatory obligations
Assessments	For our legitimate interests or those of a third party, eg to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you
External audits, eg the audit of our accounts	To comply with our legal and regulatory obligations

## **Promotional communications**

We may use your personal information to send you updates (by email, text message, telephone or post) about our Hall, booking rates and future performances and events.

We have a legitimate interest in processing your personal information for promotional purposes (see above 'How and why we use your personal information'). This means we do not usually need your consent to send you promotional communications. However, where consent is needed, we will ask for this consent separately and clearly.

We will always treat your personal information with the utmost respect and never sell OR share it with other organisations for marketing purposes.

You have the right to opt out of receiving promotional communications at any time by contacting us:-

- in writing Hanney War Memorial Hall, Brookside, East Hanney, OX12 0JL; or by
- e-mail hwmh.hanney@gmail.com

We may ask you to confirm or update your marketing preferences in the future if there are changes in the law, regulation, or the structure of our business.

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### Who we share your personal information with

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We will not share your personal information with any other third party.

#### Where your personal information is held

Information may be held at our registered offices and those of our service providers as described above (see above: 'Who we share your personal information with').

## How long your personal information will be kept

We will keep your personal information while you have a contract with us or whilst we are providing promotional communications to you. Thereafter, we will keep your personal information for as long as is necessary:

- to respond to any questions, complaints or claims made by you or on your behalf;
- to show that we treated you fairly;
- · to keep records required by law.

We will not retain your personal information for longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of personal information.

## Your rights

You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your personal information (the right of access)
Rectification	The right to require us to correct any mistakes in your personal information
To be forgotten	The right to require us to delete your personal information—in certain situations
Restriction of processing	The right to require us to restrict processing of your personal information - in certain circumstances, e.g. if you contest the accuracy of the data
Data portability	The right to receive the personal information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
To object	The right to object:
	<ul> <li>at any time to your personal information being processed for direct marketing (including profiling);</li> </ul>
	<ul> <li>in certain other situations to our continued processing of your personal information, e.g. processing carried out for the purpose of our legitimate interests.</li> </ul>
Not to be subject to automated individual decision-making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

For further information on each of those rights, including the circumstances in which they apply, please contact us or see the <u>Guidance from the UK Information Commissioner's Office (ICO) on individuals' rights under the General Data Protection Regulation</u>.

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If you would like to exercise any of those rights, please:

- email, call or write to us—see below: 'How to contact us'; and
- let us have enough information to identify you eg your full name and address
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- let us know what right you want to exercise and the information to which your request relates.

## Keeping your personal information secure

We have appropriate security measures to prevent personal information from being accidentally lost, or used or accessed unlawfully. We limit access to your personal information to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

### How to complain

We hope that can resolve any query or concern you may raise about our use of your information.

The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <a href="https://ico.org.uk/concerns">https://ico.org.uk/concerns</a> or telephone: 0303 123 1113.

### Changes to this privacy policy

This privacy notice was published on 25 May 2018.

We may change this privacy notice from time to time—when we do we will inform you via our website and email.

#### How to contact us

Please contact us by post, email or telephone if you have any questions about this privacy policy or the information we hold about you at:-

Hanney War Memorial Hall,

**Brookside** 

**East Hanney** 

**OX12 0JL** 

e-mail - hwmh.hanney@gmail.com

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