

## **Preamble**

This document is the Data Protection Policy of Clapham cum Newby Village Hall. All committee members/trustees are committed to protecting the privacy of all individuals using the hall or engaging with those who manage and run it, including those who are customers or visitors to its website. They are aware of their responsibilities under the Data Protection Act 2018 and understand the principles as listed at Appendix 2.

## **Version and modification history**

This policy is reviewed annually. In January 2024, additional information was added about its newly-deployed internet-based bookings system which is operated on the Hall's behalf by Lemon Booking. It was reviewed again in August 2025 to add information about the new Fire Safety Policy due to be implemented in October 2025.

## **What is Personal Data?**

Personal data is any data that relates to an identifiable individual, such as name, address, contact details, age, gender, family details. It can include:

- Online identifiers e.g. email addresses.
- Employee, volunteer and trustee information.
- Age (including trustee dates of birth provided for the Charity Commission's annual return).
- Databases holding contact information e.g. about bookings, newsletter mailings, ticket sales.
- CCTV footage.
- Financial information.
- Data held for fundraising purposes - e.g. lists of individual donors, gift aid reclaim records.
- Data held for publicity purposes - e.g. photos of identifiable people at events.
- Data held to record training – e.g. records of those receiving Fire Safety training.

## **Policy on Information Collection, Processing and Retention**

1. Personal data is collected by Clapham cum Newby Village Hall solely in pursuit of the organisation's legitimate interests.
2. Clapham cum Newby Village Hall uses personal data for the purposes of managing and maintaining the hall, its bookings and finances, fundraising, and running and marketing events at the hall. Data may be retained for up to 7 years for accounts purposes and for longer where required e.g. by the hall's insurers.
3. The Clapham cum Newby Village Hall Management Committee recognises the right of any data subject to request access to the data held on them and will respond to such request in a timely manner in accordance with the requirements of Data Protection Act 2018. Details of the data held are in Appendix 1.
4. Clapham cum Newby Village Hall uses a third-party, computer-based, system for managing bookings. The system is provided by Lemon Booking, a subsidiary for Tectonic Software ApS of Copenhagen, Denmark. Data associated with bookings, including website visitors, self-managed personal details of customers, and information related to payments (including card details when payments are made online via Stripe) is stored on systems operated by Lemon Booking. Data held by Lemon Booking on behalf of Clapham-cum-Newby Village Hall is subject to their Privacy Policy as described at <https://claphamcumnewbyvillagehall.org.uk/info/privacy>

5. Every customer using the online bookings system will have their own user profile which they can access to view and change their own details. These profiles are password protected and users are encouraged to keep their password secure. Clapham cum Newby Village Hall's trustees cannot be held responsible for any security breaches resulting from a user's own poor password discipline.
6. All Clapham cum Newby Village Hall Management trustees recognise the importance of keeping personal data safe. Any such data held on personal IT equipment (e.g. PCs, laptops, tablets, phones) will be password protected. Any losses of data will be immediately reported to the Secretary.
7. Should a suspected data breach occur, Lemon Booking will be requested to investigate the incident and advise the committee of their findings. The committee will then take steps, as required, to rectify the situation.

## **Appendix 1 – Data Map**

Process	Data Held
Website Visitors	IP addresses and any data captured during a booking enquiry.
Hall Bookings	Hirer's name, address, email address, telephone number, card details (if online payment was made by a credit/debit card) and bank details (if provided to expedite refunds). Name of the hirer's appointed Fire Safety Manager, along with any fire safety training records.
Contractors	Contact details and bank information for payment of invoices, any fire safety training records.
Trustees	Contact details and any fire safety training records.

## **Appendix 2 – Data Protection Principles (the Data Protection Act 2018)**

1. Personal data shall be processed fairly and lawfully.
2. The purposes for processing personal data shall be specified, explicit and legitimate.
3. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
4. Personal data shall be accurate and, where necessary, kept up to date.
5. Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
6. Personal data shall be processed in a secure manner.

An individual has the right to demand or access a copy of their collected personal data and other information.