

**Comberton Village Institute Trust**  
**Charitable Incorporated Organisation 1189495**

***Data Protection Policy***

The inappropriate release of personal data can cause harm or distress to individuals. This policy is designed to minimise the risk of such release, to ensure that the reputation of the Trust is not damaged through improper use of personal data, and to comply with all current legislation including the UK GDPR, Data Protection Act 2018, and the Data (Use and Access) Act 2025 (DUAA).

**1. What is personal data?**

Personal data relates to information about living individuals which enables them to be identified, e.g. names, addresses, telephone numbers, email addresses, bank account details, photographs, video recordings, etc. The combination of data elements (e.g. name with salary, health, or religious beliefs) would be classed as personal data. Special category data (such as health, racial or ethnic origin, or religious beliefs) receives additional protections.

**2. What personal data do we collect and why?**

**Hirers**

Personal details necessary for making and managing hall bookings.

**Users of services and events**

Contact details to inform users about events; photographs for publicity purposes of public events; CCTV images of individuals inside and outside the hall (stored for ~3 months, viewed only in case of incident, with restricted access).

**Employees**

Data necessary to fulfil duties as employer.

**Donors**

Data necessary to reclaim Gift Aid, held for as long as the donor is liable for income tax.

**Trustees and volunteers**

Personal details shared for contact purposes; bank details may be held to reimburse expenses.

Processing is carried out on the lawful bases of consent, contract, legal obligation, legitimate interests, or other bases recognised by DUAA (such as safeguarding, crime prevention, or emergency response).

**3. For how long do we retain personal data?**

We retain personal data for the minimum period necessary to meet legal obligations, audit requirements, or hall management needs. Longer retention may occur if it is in the Trust's legitimate interests. Data is regularly reviewed and securely deleted when no longer required.

#### **4. What do we do with personal data?**

We collect, amend, handle, store, and disclose personal data to manage the operation of the hall and to comply with legal obligations. Data may also be processed where DUAA permits proportionate use in the public interest or for safeguarding.

#### **5. How do we share personal data?**

We may share personal data with:

- Trustees and the Village Hall Administrator
- Third parties providing accounting or independent financial examination
- HMRC and the Charity Commission.

Only the minimum data necessary is shared, and only with organisations that meet UK and DUAA data protection standards.

#### **6. What privacy choices are available to you?**

- Providing data: You may decline to provide data, though some services may then be unavailable to you as a result.
- Communications: You may opt out of communications at any time.
- Cookies / online services: Essential cookies do not require consent. For non-essential cookies (e.g. analytics), you have the choice to opt out, in line with DUAA.

#### **7. What are your rights?**

You have the following rights:

- Access to your data (Subject Access Requests – SARs). Under the DUAA changes we will conduct reasonable and proportionate searches and whilst the response time remains one month, it may be paused if clarification is needed.
- Rectification of inaccurate data
- Restriction of processing
- Objection to certain uses
- Deletion where lawful
- To be informed how your data is used
- Data portability (where applicable)

#### **8. How do we protect your personal data?**

- Data is stored on Trust-owned computers and paper records held by Trustees or the Village Hall Administrator.
- Security measures include firewalls, encryption, physical access controls and access authorisations.
- Any data breaches will be reported to the Information Commissioner's Office (ICO) in line with legal requirements.
- Outgoing Trustees and volunteers must return or delete data they hold from their role.
- We pay a data protection fee to the ICO.

#### **9. Automated Decision-Making and Profiling**

If the Trust uses automated processes that significantly affect individuals:

- Individuals will be informed and may request human review.
- Safeguards are in place to ensure fairness and transparency.
- Special category data will only be processed with explicit consent or a DUAA-recognised public interest condition.

## **10. Complaints**

Complaints should be addressed to the Trustees in the first instance. If unresolved, individuals may escalate to the ICO. DUAA requires us to provide an electronic method of complaint and an email can be provided on request.

## **11. Data Protection Officer (DPO)**

The Trustees remain collectively responsible for Data Protection.

### References:

Information Commissioner's Office (ICO): [www.ico.org.uk](http://www.ico.org.uk)

ACRE Information Sheet No. 4: Data Protection for Village Halls and Community Buildings  
Data (Use and Access) Act 2025