

# **Maxey Community Association Maxey Village Hall**

## **Privacy and Data Protection Policy**

### **Compliance with the law**

Your privacy is important to us. We provide this notice to explain our information practices and the choices you can make about the way your information is collected and used.

The Trustees of Maxey Community Association (Maxey Village Hall) comply with the General Data Protection Regulation (GDPR) introduced by the Office of the Information Commissioner in May 2018. The lawful basis on which we collect and process personal information (i.e. for a private individual) is limited to the following:

Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract.

As a general principle, we collect and process no other information about individuals and only retain this information for as long as is necessary for our annual audit to be completed. Once our annual accounts have been audited and certified as a true record, we take all practical steps to erase personal information, except where clearly identified later in this policy.

The Association has several contracts with suppliers of goods and services. The majority of these are with limited companies whose contact information is already in the public domain. However, some may be sole traders, trading from a private address. Details of these contracts are published for transparency purposes, and all invoices from such suppliers are retained and published un-redacted (no details erased or hidden). The Association has a legal obligation to demonstrate how its funds have been spent and considers the lawful basis for retaining this information to be:

### **Our Commitment to Children's Privacy**

Protecting the privacy of the very young is especially important. For that reason, Maxey Community Association will never knowingly collect or maintain information from those who are under 18, and no part of our website is structured to attract anyone under 18.

### **Collection of Personal Information from the Maxey Village Hall Website**

When visiting the Village Hall website, the IP address of the device used to access the site, along with the dates and times of access, may be logged by our internet service provider. This information is used by Maxey Community Association to analyse usage trends. Recorded IP addresses are not linked to personally identifiable information. The Village Hall web site does not use cookies or other methods of recording visits to the site.

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### **Collection and Use of Personal Information**

The Appendix table details all the personal data we collect, how we store and protect it, who has access to it and what happens to the data when it is no longer required. Personal data will be:

1. only used for the specific purpose we collect for, for example, 200 club lottery data will only be used in connection with the 200 club.
2. protected according to the level of risk, for example, bank account details will be given a higher level of protection than someone's name.
3. password protected. All Trustees that have access to personal data on the OneDrive Account, agree to not saving the password on their PC or other similar devices, therefore it is a requirement to enter the password each and every time the account is accessed. Passwords are changed regularly.
4. deleted from electronic records and paper copies shredded as soon as practicable, once the data is no longer required. In addition, all personal data kept by the MCA is reviewed annually and removed as required.
5. stored on a secure Microsoft OneDrive. Only Trustees will have access to this drive as detailed in the Appendix table.
6. excluded from the Village hall electronic booking calendar, which is available on the Maxey Village Hall website. Only the event details will be on the booking calendar, unless for regular users, their contact information is displayed, if we have their consent.

### **Finally**

You have the right to know what personal data we hold for you. Please contact us on [Maxeyvillagehall@yahoo.com](mailto:Maxeyvillagehall@yahoo.com) if you have any queries.

### **Changes to this Privacy Statement**

The contents of this statement may be altered at any time, at our discretion.

<http://www.maxeyvillagehall.co.uk>

Approved by Trustees at the committee meeting on 8th November 2022

**Mark Asplin on behalf of the MCA Trustees**

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### Appendix - Categories of personal information collected, level of protection and storage.

Category	Collected Information	Type of document	Security Level	Storage Protection	Trustee Access
Repeat / One off Hires	<ul style="list-style-type: none"> <li>Name,</li> <li>address,</li> <li>telephone numbers,</li> <li>email addresses,</li> <li>bank details</li> </ul> via booking form and invoices using the website and email.	Paper and Electronic copy	High	<ul style="list-style-type: none"> <li>One Drive Access and</li> <li>Specific folder password protected.</li> <li>Emails – devices must have suitable protection. Relevant emails deleted at least annually through audit process</li> <li>Paper copies of invoices and booking forms scanned and stored on One Drive. Paper copies shredded.</li> </ul>	Treasurer Ass Treasurer Booking Officer (Hall manager) Chairperson
200 Club	<ul style="list-style-type: none"> <li>Name</li> <li>Address</li> <li>Telephone numbers,</li> <li>Email addresses</li> <li>Bank details</li> </ul>	Electronic Spreadsheet and email	High	<ul style="list-style-type: none"> <li>One Drive Access and</li> <li>Specific folder password protected and</li> <li>Spreadsheet file password protected.</li> <li>Spreadsheet file password changed every time file is updated.</li> <li>Electronic archived spreadsheets kept for a maximum of 12 months</li> </ul>	Treasurer 200 club person Chairperson
MCA Meeting minutes	<ul style="list-style-type: none"> <li>No personal data collected</li> </ul>	Paper and Electronic copy	Low	<ul style="list-style-type: none"> <li>One Drive Access</li> </ul>	All Trustees
Key holders	<ul style="list-style-type: none"> <li>Name</li> <li>Address</li> <li>Telephone numbers</li> <li>Email</li> </ul> For Trustees, Regular and Emergency hall users.	Electronic	Low	<ul style="list-style-type: none"> <li>One drive access and</li> <li>File password protected.</li> <li>Paper copies not allowed</li> </ul>	All Trustees
Village Hall Records	Contractors / suppliers: <ul style="list-style-type: none"> <li>Name</li> <li>Address</li> <li>Telephone numbers</li> <li>Email</li> <li>Bank details</li> </ul>	Electronic and paper copies	Low	<ul style="list-style-type: none"> <li>One Drive Access and</li> <li>Specific folder password protected</li> <li>Paper copies kept secure and archived in locked storage for up to five years.</li> <li>Paper copies scanned where practical and paper copy shredded.</li> </ul>	Treasurer Ass Treasurer Booking Officer (Hall manager) Chairperson Vice chair

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Category	Collected Information	Type of document	Security Level	Storage Protection	Trustee Access
Bank Accounts and Accounts details	<ul style="list-style-type: none"> <li>• Contactor Supplier personal details as above.</li> <li>• Names and account details of payees</li> </ul>	Electronic and paper copies	Low	<ul style="list-style-type: none"> <li>• One drive Access and</li> <li>• Specific folder password protected</li> <li>• Payee bank details stored in online bank account</li> <li>• Paper copies kept secure and then archived in locked storage for up to five years.</li> <li>• Paper copies scanned where practical and paper copy shredded.</li> <li>• Specified bank account users with own log on criteria.</li> </ul>	Treasurer Ass Treasurer Booking Officer (Hall manager) Chairperson
Events	<ul style="list-style-type: none"> <li>• Generally, no personal data is collected</li> </ul>	Electronic and paper copies	Low	<ul style="list-style-type: none"> <li>• One Drive Access</li> <li>• Relevant papers scanned and stored on OneDrive and paper shredded.</li> </ul>	All Trustees
Emails (including specific YAHOO email account)	<ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Telephone numbers</li> <li>• Email</li> <li>• Bank details</li> </ul>	Electronic	Medium	<ul style="list-style-type: none"> <li>• Emails – devices must have suitable protection.</li> <li>• Relevant emails deleted when necessary information has been stored in Specific files on OneDrive or at least annually through audit process.</li> </ul>	All Trustees