

# Enstone Parish Hall - Privacy Policy

## 1. INTRODUCTION

Enstone Parish Hall is a registered charity and is managed by the Enstone Parish Hall Management Committee (EPHMC). The EPHMC is committed to protecting your privacy and security. This policy explains how and why we use your personal data, to ensure you remain informed and in control of your information. For the purposes of this policy the term 'supporter' means a person who is a member of the committee, enters into an agreement to hire the Parish Hall, volunteers their services to help out or fundraise.

From February 2018, EPHMC asked its supporters to "opt-in" for marketing communications. This meant you had the choice as to whether you wanted to receive these messages and be able to select how you wanted to receive them (email, phone, SMS or post). You can decide not to receive communications or change how we contact you at any time. If you wish to do so please contact Administration by emailing [admin@enstoneparishhall.org](mailto:admin@enstoneparishhall.org), writing to EPHMC Administration, Enstone Parish Hall, The Paddocks, Enstone, OX7 4AZ or telephoning 07391 231 304.

We will never sell your personal data, and will only ever share it with organisations we work with where necessary and if its privacy and security are guaranteed.

### **Questions?**

Any questions you have in relation to this policy or how we use your personal data should be sent to [dpofficer@enstoneparishhall.org](mailto:dpofficer@enstoneparishhall.org) or addressed to The Data Protection Officer, Enstone Parish Hall, The Paddocks, Enstone, OX7 4AZ

## 2. ABOUT US

Your personal data (i.e. any information which identifies you, or which can be identified as relating to you personally) may be collected and used by the Enstone Parish Hall Management Committee (charity no. 226105, data controller registration number ZA300245), Enstone Parish Hall, The Paddocks, Enstone, OX7 4AZ. For the purposes of data protection law, EPHMC will be the controller.

## 3. WHAT INFORMATION WE COLLECT

### **Personal data you provide:**

- We collect data you provide to us. This includes information you give when joining the Committee, entering into a hire agreement, volunteering or communicating with us. For example: personal details (name, email, address, telephone etc.) when you join the committee, hire the hall or volunteer.
- Information created by your involvement with Enstone Parish Hall
- Your activities and involvement with EPHMC will result in personal data being created. This could include details of how you've helped us by volunteering or being involved with our activities.
- If you decide to donate to us then we will keep records of when this gift was made and what it was for.

### **Information we generate:**

- We may conduct research and analysis on the information we hold, which can in turn generate personal data. For example, by analysing your interests and involvement with our activities we may be able to build a profile which helps us decide which of our communications are likely to interest you.

**Information from third parties:**

- We sometimes receive personal data about individuals from third parties. For example, if we are partnering with another organisation (e.g. you provide your information to another charity we are collaborating with).
- We may collect information from social media where you have given us permission to do so, or if you post on one of our social media pages.
- Occasionally, we may collect information about certain supporters (e.g. particularly well known or influential people) from public sources. This could include public databases (such as Companies House), news or other media. We don't do this to everyone, and it is the exception not the rule.

**Sensitive personal data:**

- We do not normally collect or store sensitive personal data (such as information relating to health, beliefs or political affiliation) about supporters and members. However there are some situations where this will occur (e.g. if you volunteer with us or if you have an accident). If this does occur, we'll take extra care to ensure your privacy rights are protected.

**Accidents or incidents:**

- If an accident or incident occurs on our property, at one of our events or involving one of our committee members (including volunteers) then we'll keep a record of this (which may include personal data and sensitive personal data).

**Volunteer:**

- If you are a volunteer (whether for specifically EPHMC, or if you are helping us for other reasons - for example you work for another organisation which is running an event with us) then we may collect extra information about you. This information will be retained for legal reasons, to protect us (including in the event of an insurance or legal claim) and for safeguarding purposes.

**4. HOW WE USE INFORMATION**

We only ever use your personal data with your consent, or where it is necessary in order to:

- Enter into, or perform, a contract with you.
- Comply with a legal duty.
- Protect your vital interests.
- For our own (or a third party's) lawful interests, provided your rights don't override these. In any event, we'll only use your information for the purpose or purposes it was collected for (or else for closely related purposes).

**Marketing:**

We use personal data to communicate with people, to promote the Enstone Parish Hall and to help with fundraising. This includes keeping you up to date with our news, updates, campaigns and fundraising information. For further information on this please see Section 6 (Marketing).

**Administration:**

We use personal data for administrative purposes (i.e. to carry on our charity work). This includes:

- Receiving donations (e.g. direct debits or gift-aid instructions).
- Maintaining databases of our volunteers, members and supporters.

- Performing our obligations under membership contracts.
- Helping us respect your choices and preferences (e.g. if you ask not to receive marketing material, we'll keep a record of this).

## 5. DISCLOSING AND SHARING DATA

- We will never sell your personal data. If you have opted-in to marketing, we may contact you with information about our partners, but these communications will always come from EPHMC and are usually incorporated into our own marketing materials.
- Occasionally, where we partner with other organisations, we may also share information with them (for example, if you register to attend an event being jointly organised by us and another charity). We'll only share information when necessary and we'll make sure to notify you first.

## 6. MARKETING

From 12 February 2018, EPHMC asked its supporters to "opt-in" for most communications.

- This included all our marketing communications (the term marketing is broadly defined and, for instance, covers information about events, activities & fundraising).
- This meant you had the choice as to whether you wanted to receive these messages and be able to select how you wanted to receive them (post, phone, email, text).
- You can decide not to receive communications or change how we contact you at any time. If you wish to do so please contact Administration by emailing [admin@enstoneparishhall.org](mailto:admin@enstoneparishhall.org) or sending by post addressed to The Data Protection Officer, Enstone Parish Hall, The Paddocks, Enstone, OX7 4AZ

### ***What does 'marketing' mean?***

Marketing means communicating to the local community and beyond what the Parish Hall offers including news and information about:

- Events, activities and local groups;
- Appeals and fundraising (including donations and also competitions, raffles etc.);
- When you receive a communication, we may collect information about you, respond to or interact with that communication, and this may affect how we communicate with you in future.

### ***Fundraising:***

As a charity, we rely on donations and support from others to continue providing a service to the local community. From time to time, we will contact members and supporters with fundraising material and communications. This might be about an appeal, a competition we're running, or to suggest ways you can raise funds (e.g. a sponsored event or activity). As with other marketing communications, we'll only contact you specifically about fundraising if you've opted into to receiving marketing from us (and you can, of course, unsubscribe at any time).

## 7. YOUNG PEOPLE

### ***Photographs, pictures, stories on our website:***

We want young people to join in Parish Hall activities, and there are opportunities to share their photos, stories and pictures on our website. If we publish your child's picture, photo or story, we'll usually include their first name and age with it. If they write an article or story for us, we might also include their surname alongside it.

**Parental permission:**

If your child is under 18 then we'll need permission from you as their parent or guardian for them to share a picture, photo or story with us.

**Information for parents:**

We take great care to protect and respect the rights of individuals in relation to their personal data, especially in the case of children. If your child is under 18, we'll only use his or her personal data with your consent. This means that, for example, if your child wants to have his or her name or picture featured in one of our website blogs, we'll need you to confirm you're happy for us to do so.

**Marketing and fundraising:**

We won't send marketing emails, letters, calls or messages to under 18 year-olds and, in order to donate to EPHMC you need to be an adult.

**8. HOW WE PROTECT DATA**

We employ both physical and technical measures to keep your data safe and to prevent unauthorised access to, or use or disclosure of your personal information. Electronic data is stored on an off site server and is double password protected.

Of course, we cannot guarantee the security of your home computer or the internet, and any online communications (e.g. information provided by email or our website) are at the user's own risk.

**CCTV:**

Our premises has CCTV and you may be recorded when you visit the Parish Hall. CCTV is there to help provide security and to protect both you and the Parish Hall. CCTV will only be viewed when necessary (e.g. to detect or prevent crime) and footage is only stored temporarily. Unless it is flagged for review CCTV will be recorded over.

The EPHMC complies with the Information Commissioner's Office CCTV Code of Practice, and we put up notices so you know when CCTV is in use.

**9. STORAGE****Where we store information:**

The data that EPHMC hold is stored off-site on a server in the UK.

**How long we store information:**

We will only use and store information for so long as it is required for the purposes it was collected for. How long information will be stored for depends on the information in question and what it is being used for. For example, if you ask us not to send you marketing emails, we will stop storing your emails for marketing purposes (though we'll keep a record of your preference not to be emailed).

We continually review what information we hold and delete what is no longer required. We never store payment card information.

**10. KEEPING YOU IN CONTROL**

We want to ensure you remain in control of your personal data. Part of this is making sure you understand your legal rights, which are as follows:

- The right to confirmation as to whether or not we have your personal data and, if we do, to obtain a copy of the personal information we hold (this is known as subject access request);
- The right to have your data erased (though this will not apply where it is necessary for us to continue to use the data for a lawful reason);
- The right to have inaccurate data rectified;
- The right to object to your data being used for marketing or profiling; and where technically feasible, you have the right to personal data you have provided to us which we process automatically on the basis of your consent or the performance of a contract. This information will be provided in a common electronic format.

Please keep in mind that there are exceptions to the rights above and, though we will always try to respond to your satisfaction, there may be situations where we are unable to do so. If you would like further information on your rights or wish to exercise them, please email [dpofficer@enstoneparishhall.org](mailto:dpofficer@enstoneparishhall.org) or write to The Data Protection Officer, Enstone Parish Hall, The Paddocks, Enstone, OX7 4AZ.

***Complaints:***

You can complain to EPHMC directly by contacting our data protection officer using the details set out above. If you wish to make a complaint (including a complaint about fundraising activity), which does not directly relate to your data protection and privacy rights, you can do so in accordance with our charity's complaint procedure.

If you are not happy with our response, or you believe that your data protection or privacy rights have been infringed, you can complain to the UK Information Commissioner's Office which regulates and enforces data protection law in the UK. Details of how to do this can be found at [www.ico.org.uk](http://www.ico.org.uk).

**11. LINKS TO OTHER SITES**

***Links to other sites:***

Our website contains hyperlinks to other websites. We are not responsible for the content or functionality of any of those external websites (but please let us know if a link is not working by using the 'Contact us' link at the top of the page).

**12. CHANGES TO THIS PRIVACY POLICY**

We'll amend this Privacy Policy from time to time to ensure it remains up-to-date and accurately reflects how and why we use your personal data. The current version of our Privacy Policy will always be posted on our website.

This Privacy Policy was last updated on 01.01.2018.

This Privacy Policy and Complaint Procedure is published on our website:  
<http://www.enstoneparishhall.org/>