

## **Brookwood Memorial Halls – Privacy policy**

Brookwood Memorial Halls Management Committee (We) respects the privacy of personal data of its hirers, users, Trustees and staff, and undertakes to comply with all relevant regulations.

The below Policy is approved by the Management Committee and reviewed annually. Revisions will be posted on its website. The officer appointed responsibility for handling enquiries is the Chairperson. Postal enquiries should be sent to The Secretary, Brookwood Memorial Halls, c/o 207 Connaught Road, Brookwood, Woking, Surrey GU24 0AA

We collect, hold and use personal data (name, address, contact details, hire bookings and settlement of hire charges and costs) of individual hirers, responsible representatives of hire groups, Trustees, employees and volunteers. We hold personal data for purposes of contract or legitimate interest. We hold personal data to manage employment, service, supply, or hire contract terms and conditions, for legitimate purposes associated with upkeep of the Halls, including contractual hire, management, maintenance, supply, improvement, upkeep, fundraising, marketing, advertising, and financial control of the Hall and activities. We do not pass personal data on to outside commercial organisations or to third parties beyond our IT service providers who would be contractually bound to protect personal data to these standards.

We maintain records of data subjects on Trustees' personal computers or devices protected by software or biometric access control. We store and share hire data between Trustees and staff by email or using external or Cloud based systems shared, protected by private link or password. We seek to ensure that any IT service providers used are GDPR compliant. We do not share personal unpublished data without consent of subjects beyond our Bankers, insurers or legal representatives, our Charity Commission-required Independent Financial Examiner, or as required by law. We do not keep personal data for periods beyond those needed to manage contractual rights and liabilities, up to 7 years from contract completion for financial records.

We maintain a Website which carries details of Hall facilities and which includes Hirer contact details, drawn from published sources or with consent of contacts. We do not use or track visits to the website. Data under our control would be updated promptly on valid request to [management@bmhalls.org.uk](mailto:management@bmhalls.org.uk) We maintain a presence on social media for ease of communication; we do not post or encourage posting of personal data there. We ask that any images posted there are properly permitted. Links to other websites are subject to their own controls and purposes, beyond our control or responsibility. We may record images of activities in the Hall grounds not inside the buildings for the purposes of security and safety. These images would be stored securely and not kept beyond reasonable periods, and not shared outside our Trustees unless for legal reasons, or required by law or our Insurer. No facial recognition software is used by us.

Individuals are entitled to request a copy of the personal data held. Upon appropriate written request we will provide this in a reasonable time period. We will correct erroneous data on valid request. We may charge a reasonable amount for extensive requests. We may decline repetitive or baseless requests. You have the right to complain to the Information Commissioner's Office.

Reviewed and Approved by the Management Committee on 1 June 2020