

Llangunllo Community Hall

GDPR Policy

Llangunllo Community Hall (LCH) is committed to a policy of protecting the rights and privacy of individuals, however we do need to collect and use certain types of data in order to carry on our work of managing the Hall.

Personal data relates to information about living individuals who can be identified from that data and where the unlawful use of that data could cause an individual damage or distress. LCH is legally obliged to follow rules relating to any personal data that it stores or uses, whether in hard copy or on a computer, memory stick, disc or mobile phone, as laid down in the Data Protection Act 1998 and General Data Protection Regulations (GDPR).

This policy sets out the guidelines that all trustees and volunteers must follow to comply with these legal rules and relates to personal data held in any of the following media:

- Paper documents such as hiring agreements, key holder lists and group contacts
- Computer and paper files holding trustee, volunteer, and user data such as names, addresses, dates of birth, telephone numbers, email addresses and bank account details
- Email addresses of audience members and users who have asked to be informed of future events
- Photographs of identifiable users taken for website or advertising material stored on mobile phones, computers, or memory sticks
- Advertising material displaying identifiable contacts

Our Obligations and Responsibilities for the Holding of Personal Data

The trustees of Llangunllo Community Hall will abide by the following obligations and responsibilities regarding personal data obtained lawfully for the purposes of managing the Hall:

1. LCH will take all reasonable steps to ensure that any personal data held is accurate, current, and still required.
2. No personal data will ever be collected without the knowledge of the individual concerned.
3. Personal data will only be kept for the purposes for which it is collected and not used for any other purposes or shown or given to any third party. In addition, it will not be kept for longer than is necessary.
4. Access to personal data will be limited to trustees, management committee members and volunteers where appropriate.
5. Personal data requested will be limited to only what is strictly necessary for the purposes for which they are being held and processed.
6. Personal data is confidential and LCH will take every reasonable precaution to ensure it is stored safely and securely. Any paper documents (such as hiring agreements) will not be copied and originals will be filed securely until destroyed.

7. Individuals have the right to view their personal data, request confirmation as to whether or not their data is in use and for what purpose, request to have their data rectified if it is found to be inaccurate or incomplete or request that their data is deleted. Requests made to LCH to view personal data will be dealt with in a timely manner and in never more than 30 days as required by law and personal details will be deleted immediately if such action is requested by the data subject.
8. Emails from current or prospective users of the hall to the Trustees or Management Committee will only be kept for as long as is operationally necessary. The responsible trustees/committee members will conduct regular purges of their mailboxes to ensure this is the case.
9. Emails to distribution lists of people other than trustees or committee members will always use the blind copy (bcc) function to ensure confidentiality of email addresses. Such emails will regularly ask if the recipient still wishes to receive such communications. If the answer is no, then the recipient's email address will be immediately deleted.
10. The operation of this policy will be regularly reviewed, and a copy of the most recent version will be posted on the Languillo Village website

Lawful Bases Under GDPR

Every category of personal data must have a lawful basis to enable the data to be held and processed lawfully. There are six available lawful bases for holding and processing personal data and for each category of data we must choose which basis is most appropriate and record this.

Lawful bases require that processing be necessary for a particular purpose. If you can reasonably achieve the same purpose without holding and processing the data, you do not have a lawful basis and so should not be collecting that category of data.

The available legal bases are as follows:

- a) Consent: the individual has clearly consented to the processing of their personal data for a specific purpose.
- b) Contract: the processing is necessary for a contract we have or are about to have with the individual.
- c) Legal obligation: the processing is necessary for us to comply with the law (not including contractual obligations).
- d) Vital interests: the processing is necessary to protect someone's life.
- e) Public task: the processing is necessary for us to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law.
- f) Legitimate interests: the processing is necessary for our legitimate interests with regard to the management of the Hall.

At LCH we are unlikely to have categories of personal data falling under legal bases (d) and (e).

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, LCH shall promptly assess the risk to people's rights and

freedoms and if appropriate report this breach to the Information Commissioner's Office within 72 hours as required by law.

Privacy Notice

The following privacy notice will be prominently displayed on the Llangunllo Village website.

Llangunllo Community Hall uses personal data for the purposes of managing the hall, its bookings and finances, running and marketing events at the hall, and any fundraising activities.

Data may be retained for up to 6 years for accounts purposes and for longer where required by the hall's insurers.

If you would like to find out more about how we use your personal data or want to see a copy of information that we hold about you, please contact the Hall Secretary.

Document version control

Version No	Review Changes	Author or owner	Date
1.0	First version	Lynn Clark	24/06/22
2.0	Removed reference to a register of personal data	Lynn Clark	02/06/25