

**WEST MEON VILLAGE HALL**  
Charity No. 274661

**General Data Protection Policy**

This document is the General Data Protection Policy of the West Meon Village Hall (the 'Village Hall')

**Introduction**

The management committee of the Village Hall (the 'management committee') is committed to a policy of protecting the rights and privacy of individuals. It needs to collect and use certain types of data in order to carry on the work of managing the Village Hall. This personal information must be collected and handled securely.

The Data Protection Act 1998 (DPA) and General Data Protection Policy (the 'GDPR' and, together with the DPA, referred to as the 'Act') govern the use of information about people ('personal data'). Personal data can be held on computers, laptops and mobile devices, or in a manual file, and includes email, minutes of meetings and photographs.

The members of the management committee will remain the data controller for the information held and are personally responsible for processing and using personal information in accordance with the DPA and GDPR. Members of the management committee who have access to personal information will therefore be expected to read and comply with this policy.

**Purpose**

The purpose of this policy is to set out the Village Hall's commitment and procedures for protecting personal data. Members of the management committee regard the lawful and correct treatment of personal data as very important to successful working, and to maintaining the confidence of those whom they deal with. The risks to individuals of identity theft and financial loss if personal data is lost or stolen is recognised.

**The Data Protection Act**

This contains 8 principles for processing personal data with which the management committee must comply.

Personal Data

1. Shall be processed fairly and lawfully and, in particular, shall not be processed unless specific conditions are met.
2. Shall be obtained only for one or more of the purposes specified in the Act and shall not be processed in any manner incompatible with that purpose or those purposes.
3. Shall be adequate, relevant and not excessive in relation to those purposes.
4. Shall be accurate and, where necessary, kept up to date.
5. Shall not be kept for longer than necessary.
6. Shall be processed in accordance with the rights of data subjects under the Act.
7. Shall be kept secure by members of the management committee who shall take appropriate technical and other measures to prevent unauthorised or unlawful processing or accidental loss or destruction of, or damage to, personal information.
8. Shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal information.

## **Applying the Data Protection Act within the Village Hall**

The members of the management committee will collect personal data for the purpose of managing the Village Hall, its hirings and finances and inform persons who enquire of those purposes. It is their responsibility to ensure that the data is only used for these purposes. Access to personal information will be limited to members of the management committee.

### **Correcting Data**

Individuals have a right to make a Subject Access Request ('SAR') to find out whether members of the management committee hold their personal data, where it is held, what it is used for and to have data corrected if it is wrong. Any SAR must be dealt with within 30 days. Steps must first be taken to confirm the identity of the individual before providing information, requiring both photo identification e.g. passport and confirmation of address e.g. recent utility bill, bank or credit card statement.

### **Responsibilities**

The members of the management committee are legally responsible for complying with the Act. They will take into account all legal requirements of the Act and ensure that they are properly implemented and will, through appropriate management, determine what purposes personal information will be used. The members of the management committee will:

- a) Collect and use information fairly.
- b) Specify the purposes for which the information is used.
- c) Collect and process appropriate information to fulfil its operational needs or to comply with any legal requirements.
- d) Ensure the quality of information used.
- e) Ensure the rights of people about whom information is held can be exercised under the Act.

These include:

- i) The right to be informed that processing is undertaken.
  - ii) The right of access to one's personal information.
  - iii) The right to prevent processing in certain circumstances, and
  - iv) The right to correct, rectify, block or erase information which is regarded as wrong information.
- f) Take appropriate technical and organizational security measures to safeguard personal information.
  - g) Ensure that personal information is not transferred abroad without suitable safeguards.
  - h) Treat people justly and fairly whatever their age, religion, disability, gender, sexual orientation or ethnicity when dealing with requests for information.
  - i) Set out clear procedures for responding to requests for information.

### **Procedure for Handling Data and Data Security**

The members of the management committee have a duty to ensure that the appropriate technical and organizational measures and training are undertaken to prevent:

- a) Unauthorised or unlawful processing of personal data.
- b) Unauthorised disclosure of personal data.
- c) Accidental loss of personal data.

All members of the management committee must therefore ensure that personal data is dealt with properly no matter how it is collected, recorded or used. This applies whether or not the information is held on paper, in a computer or recorded by some other means.

All members of the management committee are aware that a breach of the rules and procedures identified in this policy may lead to action being taken against them.

### **Policy**

The policy and procedures will be reviewed annually.