

## **SOBERTON VILLAGE HALL**

### **Privacy Statement**

This privacy statement explains how and why we collect personal information about you, how we use it, the conditions under which we may disclose it to others and how we keep it secure in accordance with the General Data Protection Regulation (GDPR).

#### **Who are we?**

Soberton Village Hall (SVH) is a registered charity whose object is to provide and maintain a village hall for the use of the inhabitants of Soberton Parish and the surrounding area without distinction of sex or of political, religious or other opinions, including use for: meetings, lectures and classes; and other forms of recreation and leisure-time occupation, with the object of improving the conditions of life for the inhabitants.

Soberton Village Hall's address is School Hill, Soberton, Hampshire, SO32 3PF.

Soberton Village Hall is committed to protecting the privacy and security of your personal information.

Soberton Village Hall is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

#### **Data Protection Principles**

We will comply with data protection law. This says that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

#### **What type of personal information is collected about you?**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). There are "special categories" of more sensitive personal data which require a higher level of protection.

The personal information we collect, store, and use about you might include the following categories:

- [Personal contact details such as name, title, addresses, telephone numbers and personal email addresses.]
- [Date of birth.]
- [Gender.]
- [Next of kin and emergency contact information.]
- [Bank account details.]
- [CCTV footage and other information obtained through electronic means.]
- [Information about your use of our information and communications systems.]
- [Photographs.]

We may also collect, store and use the following “special categories” of more sensitive personal information:

- [Information about your health, including any medical condition, health and sickness records.]

### **How do we collect personal information from you?**

We may obtain personal information about you (or your business) from these sources:

- when you contact us about SVH and services;
- when you use SVH and services;
- when somebody else contacts us on your behalf about products and services;
- when you use our website, mobile device apps or social media;
- when you talk to us on the telephone;
- when you write to us, including by email or letter;
- when you send it to us;

We may also obtain personal information about you (or your business) from third parties that we work with, including:

- Companies that introduce you to us;
- Financial advisers;
- Credit reference agencies;
- Insurers;
- Retailers;
- Social networks;
- Fraud prevention agencies;
- Public information sources such as companies registries;
- Agents working on our behalf;
- Market researchers;
- Government and law enforcement agencies.

### **How will we use information about you?**

Your privacy is protected by law. We will only use your personal information when the law allows us to. This includes sharing it outside Soberton Village Hall. Most commonly, we will use your personal information in the following circumstances:

- Where we need to perform a contract we have entered into with you.
- Where we need to comply with a legal obligation.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where you consent to it.

We may also use your personal information in the following situations, which are likely to be rare:

- Where we need to protect your interests (or someone else’s interests).
- Where it is needed in the public interest [or for official purposes].

**Situations in which we will use your personal information**

We need all the categories of information in the list above:

- to allow us to perform our contract with you;
- to enable us to comply with legal obligations; and/or
- to pursue legitimate interests of our own or those of third parties, provided that your interests and fundamental rights do not override those interests.

A legitimate interest is where we have a genuine and lawful reason to use your personal information, whether for our own purposes or for those of third party. If we rely on our legitimate interest, we will tell you what that is.

Here is a list of all the ways that we may use your personal information, and which of the reasons we rely on to do so. This is also where we tell you what our legitimate interests are.

What we use your personal information for	Our reasons	Our legitimate interests
<ul style="list-style-type: none"> <li>• To carry out our obligations arising from any contracts entered into between you and us and to provide you with any products and services that you request from us;</li> <li>• To register you as a qualification or credential holder, volunteer, committee member or in some other capacity.</li> </ul>	<ul style="list-style-type: none"> <li>• Fulfilling contracts</li> <li>• Our legitimate interests</li> <li>• Our legal duty</li> </ul>	<ul style="list-style-type: none"> <li>• Managing Soberton Village Hall for and on behalf of its beneficiaries;</li> <li>• Managing Soberton Village Hall’s relationship with its members;</li> <li>• Providing you or your business with our products and services;</li> <li>• Being efficient about how we fulfil our legal and contractual duties;</li> <li>• Carrying out our obligations arising from any contracts entered into by us;</li> </ul>

		<ul style="list-style-type: none"> <li>• Notifying you of changes to our products and services.</li> </ul>
<ul style="list-style-type: none"> <li>• If you are a user of Soberton Village Hall, to notify you about changes.</li> <li>• To notify you of any changes or proposed changes in any laws, regulations or best practice in relation to the management of Soberton Village Hall;</li> <li>• To provide you with information about other goods and services we offer that are similar to those that you have already obtained, purchased or enquired about;</li> <li>• To provide you with information about goods or services we feel may interest you;</li> </ul>	<ul style="list-style-type: none"> <li>• Fulfilling contracts</li> <li>• Our legitimate interests</li> <li>• Our legal duty</li> </ul>	<ul style="list-style-type: none"> <li>• Managing Soberton Village Hall for and on behalf of its beneficiaries;</li> <li>• Managing Soberton Village Hall's relationship with its members;</li> <li>• Providing you or your business with our products and services</li> <li>• Being efficient about how we fulfil our legal and contractual duties;</li> <li>• Complying with regulations that apply to us.</li> </ul>
<ul style="list-style-type: none"> <li>• In relation to the operation of our websites and online calendars which you use:</li> <li>• To ensure that content from our websites and online calendars is presented in the most effective manner for you and for your computer or mobile device.</li> <li>• To administer our websites and online calendars and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;</li> <li>• To identify and implement improvements in the operation of our websites and online calendars, the content included on our websites and online calendars and the way in which content is presented;</li> <li>• To allow you to participate in interactive features of our websites and online calendars, when you choose to do so;</li> <li>• As part of our efforts to keep our websites and online calendars safe and secure;</li> <li>• To measure or understand the effectiveness and relevance of advertising on our websites and online calendars.</li> </ul>	<ul style="list-style-type: none"> <li>• Fulfilling contracts</li> <li>• Our legitimate interests</li> <li>• Our legal duty</li> </ul>	<ul style="list-style-type: none"> <li>• Managing Soberton Village Hall for and on behalf of its beneficiaries;</li> <li>• Managing Soberton Village Hall's relationship with its members;</li> <li>• Providing you or your business with our products and services</li> <li>• Being efficient about how we fulfil our legal and contractual duties;</li> <li>• Carrying out our obligations arising from any contracts entered into by us;</li> <li>• Notifying you of changes to our products and services.</li> </ul>

<ul style="list-style-type: none"> <li>• Managing risk for us, our users and our beneficiaries;</li> <li>• Obeying laws and regulations that apply to us;</li> <li>• Responding to complaints and seek to resolve them.</li> </ul>	<ul style="list-style-type: none"> <li>• Fulfilling contracts</li> <li>• Our legitimate interests</li> <li>• Our legal duty</li> </ul>	<ul style="list-style-type: none"> <li>• Managing Soberton Village Hall for and on behalf of its beneficiaries;</li> <li>• Managing Soberton Village Hall's relationship with its members;</li> <li>• Complying with regulations that apply to us;</li> <li>• Being efficient about how we fulfil our legal and contractual duties.</li> </ul>
<ul style="list-style-type: none"> <li>• Running Soberton Village Hall in an efficient and proper way. This includes managing our financial position, development, communications, governance and audit.</li> </ul>	<ul style="list-style-type: none"> <li>• Our legitimate interests</li> <li>• Our legal duty</li> </ul>	<ul style="list-style-type: none"> <li>• Managing Soberton Village Hall for and on behalf of its beneficiaries;</li> <li>• Managing Soberton Village Hall's relationship with its members;</li> <li>• Complying with regulations that apply to us;</li> <li>• Being efficient about how we fulfil our legal and contractual duties.</li> </ul>
<ul style="list-style-type: none"> <li>• Exercising our rights set out in agreements or contracts.</li> </ul>	<ul style="list-style-type: none"> <li>• Fulfilling contracts</li> </ul>	

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

### **If you fail to provide personal information**

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

### **Change of purpose**

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### **How we use particularly sensitive personal information**

“Special categories” of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this

type of personal information. We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data. We may process special categories of personal information in the following circumstances:

- In limited circumstances, with your explicit written consent.
- Where we need to carry out our legal obligations or exercise rights in connection with employment.
- Where it is needed in the public interest, such as for equal opportunities monitoring.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

### **Our obligations**

We will use your particularly sensitive personal information in the following ways:

- We will use information about your physical or mental health, or disability status, where necessary to ensure your health and safety in our premises.

### **Do we need your consent?**

We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights in the field of employment law. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

### **Information about criminal convictions**

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations. Less commonly, we may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

We do not envisage that we will hold information about criminal convictions.

We will only collect information about criminal convictions where we are legally able to do so.

### **Who has access to your personal information?**

We will share your personal information with third parties where required by law, where it is necessary to administer our relationship with you or where we have another legitimate interest in doing so.

We will not sell or rent your personal information to third parties.

We will not share your personal information with third parties for marketing purposes.

We may share your personal information with these other organisations or people:

- Our third-party service providers, agents, subcontractors and other associated organisations and people who we use to help provide you with products and services;
- Revenue and customs authorities, regulators and other authorities;
- Any party linked with you or your business's product or service;
- Organisations or people we have a joint venture or agreement to co-operate with;
- Organisations or people that introduce you to us;
- Organisations or people that we introduce you to;
- Organisations or people you ask us to share your data with.

However, when we use third party service providers we disclose only the personal information that is necessary to deliver the products and services and we have a contract in place that requires them to keep your personal information secure and not to use it for their own direct marketing purposes.

### **How long do we keep your personal information?**

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. We review our retention periods for personal information on a regular basis.

We are legally required to hold some types of personal information to fulfil our statutory obligations. We will hold your personal information on our systems for as long as is necessary for the relevant activity and in any event for at least as long as you continue to be a member of Soberton Village Hall, to be employed or engaged by us, to be the recipient of our products and services, to be employed by someone who is the recipient of our products and services or to have a connection with anyone else who is the recipient of our products and services.

We may keep your personal information for up to 10 years after you stop being a member of Soberton Village Hall, stop being employed or engaged by us, stop being

the recipient of our products and services, stop being employed by someone who is the recipient of our products and services or stop having a connection with someone else who is the recipient of our products and services, for one of the following reasons:

- To respond to any questions or complaints;
- To show that we performed our contractual obligations;
- To show that we complied with other legal obligations;
- To show that we treated you and/or your employer and/or someone else fairly; or
- To maintain records according to rules that apply to us.

We may keep your personal information for longer than 10 years if we cannot delete it for legal, regulatory or technical reasons. We may also keep it for research or statistical purposes. If we do, we will make sure that your privacy is protected and that we only use your personal information for those purposes.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

### **Your duty to inform us of changes**

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

### **Your rights in connection with personal information**

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for

processing it.

- **Request the transfer** of your personal information to another party.

There may be legal or other official reasons why we need to keep or use your personal information.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact Soberton Village Hall Secretary in writing.

### **No fee usually required**

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

### **Right to withdraw consent**

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact Soberton Village Hall Secretary. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

### **Review of this Privacy statement**

We keep this privacy statement under regular review. This privacy statement was last updated in April 2019.

We may change this privacy statement from time to time and we will publish any new privacy statement on our website when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

Any questions regarding this privacy statement and our privacy practices should be sent by email to [info@sobertonvillagehall.co.uk](mailto:info@sobertonvillagehall.co.uk) or by writing to:

Soberton Village Hall Secretary

Soberton Village Hall  
School Hill  
Soberton  
Hampshire  
SO32 3PF