

General Data Protection Regulations Policy

This document is the General Data Protection Regulations Policy of the Penton Recreational Centre.

The policy has been issued by the Trustees of the Penton Recreational Centre to comply with the Data Protection Act (DPA) 1988 and, after 25 May 2018, the European Union General Data Protection Regulations (GDPR) which replace the DPA.

The Trustees will review this policy annually and also as required by any change of circumstances. The Designated Trustee for Data Protection will report to the Trustees regularly on the application of this policy and the associated procedures.

This policy is published on the PRC web site and paper copies are available on request.

Signed:

Paul Booth

Date adopted

Date for review

Designated Trustee for Data Protection

Paul Booth

01264 771741

paul_booth_uk@hotmail.com

1. Introduction

It is intended that this policy be read by the general public to inform them of their rights with regard to their personal data and by Trustees and volunteers to inform them of their responsibilities.

Article 5 of the General Data Protection Regulations (GDPR) requires that personal data is:

- a) processed lawfully, fairly and in a transparent manner in relation to individuals;
- b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d) accurate and, where necessary, kept up to date;
- e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed;
- f) processed in a manner that ensures appropriate security of the personal data, using appropriate technical or organisational measures.

The GDPR provides the following rights for individuals with regard to their personal data:

- a) The right to be informed
- b) The right of access
- c) The right to rectification
- d) The right to erasure
- e) The right to restrict processing
- f) The right to data portability
- g) The right to object
- h) Rights in relation to automated decision making and profiling.

The Trustees of Penton Recreational Centre (PRC) respect your privacy and recognise how important it is to you that your personal information remains secure. This policy sets out our rules on data protection and the conditions that must be satisfied in relation to the obtaining, handling, processing, storage, transportation and destruction of personal information. The Trustees are responsible for ensuring compliance with the DPA / GDPR

Any questions or concerns about the operation of this policy should be referred to the Trustees of PRC. If you consider that the policy has not been followed in respect of personal data about yourself or others you should raise the matter with the Designated Trustee for Data Protection.

2. Personal Data

PRC holds personal data relating to the following:

- 1) Trustees
- 2) Volunteers
- 3) Hirers of the Village Hall, Recreational Ground or other PRC facilities
- 4) Users of the Village Hall, Recreational Ground or other PRC facilities
- 5) Members of the public who explicitly provided their personal data for one or more of the purposes listed in Section 3
- 6) Providers of services, including but not limited to maintenance, repairs, cleaning, administration, marketing, accounting etc.

PRC holds the following types of personal data:

- 1) Names and contact details including postal addresses, telephone numbers, email addresses and social media identifiers
- 2) Booking data including date and time, purpose of booking, numbers of attendees and age groups
- 3) Health and Safety incident records

3. Data Collection

Personal data is collected directly by PRC when members of the public

- 1) Provide contact information for the purposes of being informed about PRC activities, operations and fund raising
- 2) Inquire about or make a booking for PRC facilities
- 3) Provide regular or one-off donations to PRC
- 4) Provide a service to PRC

Personal data shall only be collected through one of the methods listed above. Explicit authorisation must be obtained from the person providing the data to the collection of their personal data.

Personal data shall not be sold to third party organisations nor shared with third parties for their benefit.

4. Data Processing

PRC processes personal data for the following purposes:

- 1) Marketing of PRC facilities available for hire
- 2) Marketing of PRC recreational activities taking place
- 3) Informing the public about the operations of PRC
- 4) Raising funds for the Recreational Centre or its facilities
- 5) Hiring the Village Hall or its facilities
- 6) Analysing the usage and performance of the Village Hall or its facilities
- 7) Contracting for the provision of services required to manage and operate the Village Hall or its facilities

Personal data shall only be processed for one or more of purposes listed above. Personal data shall not be subject to automated decision making or profiling. Explicit authorisation must be obtained from the person providing the data to carry out data processing.

5. Data Management

PRC shall respond without delay, and within at most one month, to a request from a member of the public to provide a copy all personal data held by PRC - i.e. a Subject Access Request.

PRC shall, on request:

- 1) modify or delete personal data
- 2) modify the purposes for which personal data will be processed

Requests shall be carried out without delay, and within at most one month. Personal data shall be deleted when no longer required for the purposes listed in Section 4 above.

6. Data Security

Personal data shall be held securely. This means:

- 1) Paper records will be stored securely and with access controlled by Trustees or volunteers who have signed the GDPR Trustee or Volunteer Authorisation form
- 2) Digital records will be held on either:
 - a. a personal computer (PC, tablet etc.) which is owned and controlled by an authorised Trustee or volunteer
 - b. a cloud-based storage account which is controlled by one or more Trustees. Cloud storage must be provided by Apple, Dropbox, Google or Microsoft who comply with EU regulations or EU-US Shield provisions

Access to PRC personal data must be protected by a strong password or equivalent mechanism (e.g. fingerprint recognition). Only authorised Trustees or volunteers shall know the strong password(s) which must be protected from discovery and not shared.

Backups of digital records shall be protected in the same manner as the primary records. Removable digital media shall be stored securely.

Printouts of digital records shall be treated as paper records and stored securely. Paper records and printouts shall be shredded before disposal.

Personal data in any form shall not be shared with or disclosed to anyone other than authorised Trustees or volunteers.

Personal data shall not be disclosed when communicating with members of the public for any of the purposes listed in Section 4. This means that personal identifiers, such as email addresses shall not be disclosed in bulk communications, i.e. BCC addressing must be used.