

ASHTON KEYNES VILLAGE HALL

MANAGEMENT COMMITTEE

DATA PRIVACY POLICY

Version 1.2.0 February 2018



Ashton Keynes Village Hall is a Registered Charity. Number 1059462

The Management Committee of Ashton Keynes Village Hall consider data protection with the utmost importance. We do not automatically obtain data from anyone accessing our web-site and we only make use of a Session ID Cookie for maintaining your browser session whilst using our web-site.

Our Cookie statement is available on the web-site and for clarity detailed here:

The PHP scripting language which drives the website maintains a session ID cookie in order that it knows which user it is dealing with. This is the PHPSESSID cookie which will appear when you visit the site.

Without the cookie, the functionality of the site is impaired. Notably, members will not be able to login.

By using and browsing the AKVH website, you consent to cookies being used in accordance with this policy. If you do not consent, simply disable cookies on your browser or refrain from using the site.

We do not subject data to automatic processing and we do not share data.

It should be noted that the Village Hall cannot guarantee that the browser or social media route taken to get to our site (i.e. via Google, Facebook or WVHA) was not using Cookies or other analytics. If any data is being obtained because of the route taken to our site, please be assured that we do not get any data from them.

The Village Hall web-site is primarily a source of download information for Hall Users (containing Rules, Health & Safety Policies, Fire Safety information, etc.). It also provides authenticated users with access to our Village Hall booking system.

The site can be used by anyone to view the availability of the Hall, but the only information shown depicts the date and the Hall's availability, there is no other detail displayed.

The only access to any of the data is via authentication (Username and Password) and this is covered in more detail later.

All data protection issues are currently dealt with by the Chairman (Dave Sheppard) who can be contacted at chairman@akvh.org.uk or dave@akvh.org.uk. To meet with GDPR requirements, Dave Sheppard is the Data Controller.

All held data is treated as highly confidential and is never passed to anyone outside of those authorised to handle it.

Data is held on a UK based Server.

The data we retain falls into 3 categories:

1. The Booking Database

The data we have to obtain for people hiring the Village Hall

- The personal data required is the contact information necessary to complete the booking (name, address, telephone and email address);

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- When anyone books the Hall, this information has to be provided by the Hirer (or someone acting on their behalf) in order to complete the booking. Therefore processing of the personal data is necessary for the performance of the Contract to Hire Ashton Keynes Village Hall. We consider the lawful grounds for processing this data under the Data Protection Regulations to be that Ashton Keynes Village Hall is entering a Contract with the individual (in this case the Hirer).
- Other notes placed on the Booking may include price confirmation or specific instructions;

When a booking is made an entry will be made in the Booking Database. The details will be the text information entered as a necessary part of the booking, timing information (both the time being booked and the date and time the booking is made) and a pseudonymised reference to the Authorised User within the Regular User and Committee Database that made the booking.

Access to the Booking Database is restricted to:

- Authorised Members of the Management Committee who are permitted to book, amend or cancel for any Hirer;
- Authorised Users that represent specific Groups that are permitted to book, amend and cancel bookings for their own Group.

The Authorised Management Committee Members are able to view all of the data, whereas those representing specific Groups can only see their own data. See below for authentication details.

Data is retained for 24 months from the date of the actual hiring (not the date the booking was made). Once 24 months has been reached, the data is discarded.

Although we cannot erase the detail of the actual booking prior to the 24 month expiration, we can anonymise the booking detail if requested to do so.

When a booking is confirmed, an email confirmation which includes the personal data collected above is sent to the hirer (data subject). The email is also copied to the Bookings Email Repository (1), the Bookings Email Repository (2), the Bookings Secretary and the Cleaner. The recipient computer systems, PADS, PDAs or Smartphones are all password or passcode protected. The only email retention beyond the date of the booking is on the two Bookings Email Repositories. Both of these repositories are password protected. The Bookings Email Repository (1) is a password protected Gmail Account and stored in an encrypted format. The location of this data rests with Google. The data on Bookings Email Repository (2) is stored on a UK based password protected and auto-locked PC. When email on Booking Email Repository (2) is archived, the archived repository is further password protected using the Microsoft Outlook system. Any forwarding of emails from either Repository is in encrypted during transmission.

2. The Regular User and Committee Database (for Login purposes)

This refers to data that which we have to retain for the Users, Groups and Members of the Management Committee that are authorised to handle bookings.

Each of these Users will have their own username and password.

Where usernames and passwords are required to login, the only password detail retained by our system is the 42 digit Hash code. This is generated when someone creates their own password for the first time and once generated, the original text of the password is discarded.

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Authentication on login uses the same Hashing algorithm derived from the entered credentials to validate the person logging in.

When Users or Groups request the ability to handle their own bookings, they must provide specific information relating to their potential future bookings. Therefore processing of the personal data is necessary for the performance of the Contract to Hire Ashton Keynes Village Hall. We consider the lawful grounds for processing this data under the Data Protection Regulations to be that Ashton Keynes Village Hall is entering a Contract with the individual (in this case the Hirer or representative of the Group requiring their own booking facilities).

The data retained is Username (normally the name of the Group represented), the persons actual name and email address, the Group for which they are permitted to book, and in the case of a Management Committee member, the type of access (for making Bookings; and/or for administration; and/or for Treasurer access). The Username can be disabled, but this does not mean it is removed.

We cannot erase anyone from the Regular User and Committee Database as there could be past bookings associated with that person, however we can anonymise the data if requested to do so.

We maintain a record of logins (successful and failures). The only detail collected is the text that was entered as the Username (which could be any set of characters), the source IP Address and the date and time of the login. There is no other data recorded. This record permits us to identify Users that are continually struggling with credentials and also spot any attempts to gain unauthorised access. The data is retained for a 12 months and can be completely discarded on request.

3. Village Hall Email List

This is a list of email addresses that has been accumulated over the years that we have been operating the Rural Cinema (since 2008). All of the names initially requested to be on the Email distribution list. On each email sent we provide an opportunity for the recipient to reply with the text REMOVE ME as the Subject Header and we guarantee to remove any person from the Email distribution list that makes this request.

The data we hold in this category is only an email address and nothing else. We accept that with some email addresses there could be sufficient information to identify a natural person. Therefore when the email address is used for the purposes of forthcoming event notification, it is only used in the 'bcc' line, thereby ensuring that no other recipient is aware of any other email addresses.

We treat the lawful processing of this personal data as being in our legitimate interest of advising the data subject about a forthcoming Village Hall event. We believe that our original 'opt-in' methodology meets with the requirements of the e-Privacy Directive and that the REMOVE ME option described above, meets with the latest Data Protection Regulations. New email addresses are only added if an individual makes a direct request by email. Unless requested to remove or erase an email address, it will remain on the list indefinitely. We remove any email address that bounces 3 times in succession.

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However, any recipient can email the chairman@akvh.org.uk and request:

- Removal / Erasure
- Rectification
- Restriction of Use

or raise an objection to the data being held or processed.

Confirmation of erasure will be sent to the recipient requesting removal.

For any queries relating to data held or processed by the Village Hall, please contact the Chairman at chairman@akvh.org.uk. Alternative routes are by post to The Chairman, Ashton Keynes Village Hall, Park Place, Ashton Keynes, Swindon, SN6 6NT or for verbal communications via our service on 0344 776 0001. If you leave a message, rest assured that we will call you back.

You can also complain directly to the Supervisory Authority – The Information Commissioners Office. Their address is Wycliffe House, Water Lane, WILMSLOW, Cheshire, SK9 5AF; Tel: 03031231113 (local rate) or 01625 545745 (national number).