

Brookwood Memorial Halls



BROOKWOOD
MEMORIAL HALLS

Privacy policy

1. Scope of Policy

Brookwood Memorial Halls Management Committee (We) respects the privacy of personal data of its hirers, users, Trustees and employees, and undertakes to comply with all relevant regulations.

The below Policy is approved by the Management Committee and reviewed annually. Revisions will be posted on its website. The officer appointed responsible for handling enquiries is the Chair. Postal enquiries should be sent to The Chair, Brookwood Memorial Halls, c/o 207 Connaught Road, Brookwood, Woking, Surrey GU24 0AA

Data we collect, hold and use:

- Full name
- Contact address
- Invoicing address
- Telephone number
- Email address
- Details of hire bookings
- Settlement of hire charges and costs
- Bank details (where appropriate for refunds/payment)
- CCTV footage
- Photos of individuals using the halls

Who's data we collect, hold and use:

- Individual hirers
- Responsible representatives of hire groups
- Suppliers
- Contractors
- Trustees
- Employees
- Volunteers
- Individuals and businesses involved in events held by The Management Committee

2. How we use the data

We hold personal data to manage employment, service, supply, contracts and hire, for legitimate purposes associated with upkeep of the Halls. This includes contractual hire, management, maintenance, improvement, security, upkeep, fundraising, marketing, advertising, and financial control of the Hall and activities. We do not pass personal data on to outside commercial organisations or to third parties.

3. Maintaining and storing the data

We maintain records of data subjects on Trustees' and the Hall Manager's personal computers or devices protected by software or biometric access control. We store and share hire data between Trustees and staff by email or using external or Cloud based systems shared, protected by private link or password. We seek to ensure that any IT service providers used are GDPR compliant. We do not share personal unpublished data without consent of subjects beyond our Bankers, insurers or legal representatives, our Charity

Commission-required Independent Financial Examiner, or as required by law. We do not keep personal data for periods beyond those needed to manage contractual rights and liabilities, up to 7 years from contract completion for financial records. Our accident book contains data which pages are removed once dealt with and information is stored onto a limited computer drive. CCTV records are kept for 6 weeks and are then deleted.

We maintain a Website which carries details of Hall facilities and includes contact details of our regular hirer's who run groups, drawn from published sources and with consent of those hirers. We do not use or track Cookies or visits to the website. Data is updated promptly on valid request to management@bmhalls.org.uk. The website does not enable posting of personal comments. We maintain a presence on social media for ease of communication; we do not post personal data there. We ask that any images posted there are properly permitted. Links to other websites are subject to their own controls and purposes, beyond our control or responsibility. We may record images of activities in the Hall grounds for the purposes of security and safety. These images would be stored securely and not kept beyond reasonable periods, and not shared outside our Trustees unless for legal reasons, or required by law or our Insurer. No facial recognition software is used by us. Any breaches will be reported within 72 hours.

4. Subject access request

Individuals are entitled to request a copy of the personal data held. Upon written request we will respond without delay and within one month of receipt of the request. We may extend the time limit by a further two months if the request is complex or if we receive a number of requests from an individual. We will correct erroneous data on valid requests and we may charge a reasonable amount for excessive requests. We may decline repetitive or baseless requests. You have the right to complain to the Information Commissioner's Office. Requests should be emailed to management@bmhalls.org.uk or written to The Chair, Brookwood Memorial Halls, c/o 207 Connaught Road, Brookwood, Woking, Surrey GU24 0AA.

Reviewed and Approved by the Management Committee September 2024