

Masham Town Hall Community Charity

Data Protection and Privacy Policy

n.b. As in all MTHCC matters, the word 'staff' encompasses Trustees and all non-Trustees on MTHCC business, whether paid staff or volunteers.

Purpose

This policy explains the approach of Masham Town Hall Community Charity Ltd ("MTHCC") to data protection as regulated by The General Data Protection Regulation Act 2018 ("the Act") in relation to employees, volunteers, funders, customers, clients and other third parties.

1. Principles

MTHCC regards the lawful and correct treatment of personal information as important to successful working and to maintaining the confidence of those with whom it deals.

MTHCC complies with the eight principles of good information handling enforced by the Act:

- a. Data must be processed fairly and lawfully
- b. Data must only be used for specific purposes
- c. Data must be adequate, relevant and not excessive
- d. Data must be accurate and kept up-to-date
- e. Data must not be kept for longer than necessary
- f. The rights of Data Subjects must be respected
- g. Organisations must take appropriate steps to maintain security
- h. Data must not be transferred abroad without adequate protection.

This policy will be updated as necessary to reflect best practice in data management, security and control and to ensure compliance with changes or amendments made to the Act.

2. Policy

MTHCC needs to collect and use certain types of information about the Data Subjects with whom it comes into contact. This personal information will be collected and dealt with appropriately – whether on paper, in a computer, or in another form (e.g. photographs, recordings). The organisations and individuals about which MTHCC holds information are referred to in this policy as data subjects. MTHCC will ensure that:

- a. everyone processing personal information is appropriately trained and supervised;
- b. anybody wanting to make enquiries about handling personal information knows what to do;
- c. any enquiries about handling personal information are dealt with promptly and courteously;
- d. the handling of personal information is clearly described;
- e. the management and use of personal information is regularly reviewed.

3. Responsibilities

MTHCC is the Data Controller under the Act, which means that it determines for what purposes personal information will be used.

The Administrator / Company Secretary is the central point of contact at MTHCC for all data compliance issues.

If a member of MTHCC staff is in a position to deal with personal information about other staff, they will be given guidance on their obligations, and must seek clarification if unsure.

4. Procedure

4.1 Disclosure

MTHCC may share data with other agencies, either as a legal requirement (e.g. Companies House, Charity Commission, HM Revenue and Customs) or a contractual obligation (e.g. local authorities, funding bodies). The Data Subject will be made aware in most circumstances how and with whom their information will be shared.

There are circumstances where the law allows organisations to disclose data (including sensitive data) without the data subject's consent. These are:

- a. Carrying out a legal duty or as authorised by the Secretary of State;
- b. Protecting vital interests of a Data Subject or other person;
- c. Where the Data Subject has already made the information public;
- d. While conducting legal proceedings or obtaining legal advice;
- e. Monitoring for equal opportunities purposes;
- f. Where the Data Subject's consent cannot be obtained or where it is reasonable to proceed without consent: e.g. where providing consent would cause stress to a vulnerable person.

4.2 Information held by the Organisation

Information held by MTHCC relates to organisations and individuals with whom it works or comes into contact.

MTHCC will not give out information about any individual unless:

- a. explicit consent is given;
- b. MTHCC is satisfied that the individual knows this type of disclosure may be made;
- c. the information is already in the public domain,
- d. and/or there is some over-riding reason for the disclosure (see 5.1 above).

No details of individuals will be passed to other organisations for marketing, fundraising or circulating information, without a minuted resolution at a Trustees meeting indicating the specific terms and conditions of such circulation, which will then be added as an appendix to this policy.

4.3 Storage

- a. Manual files containing sensitive information will be labelled confidential and kept in locked filing cabinets, accessible only to relevant staff.
- b. Computer records and files containing sensitive information will be password protected, accessible only to relevant staff.
- c. Information held about employees will only be collected and recorded with good reason, and will be stored securely and for only as long as required. This information is held for management and administrative use only.

4.4 Data Access Requests

A Data Subject may make a subject access request ("SAR") at any time to see the information which the Organisation holds about them.

SARs must be made in writing, accompanied by a fee of £5. Upon receipt of a SAR, MTHCC will respond within 28 days. The following information will be provided to the data subject: Whether or not MTHCC holds any of their personal data and if so what; details of what that personal data is used for..

4.5 Data collection

MTHCC may collect the following information:

- a. Email addresses when signing up to the mailing list. This is not linked to any other personal information and is used only for occasional emails about performances and activities at, and news related to, Masham Town Hall.
This information is kept on a password-protected third party website as part of a single mailing list, and is neither used for individual contact nor held on MTHCC's own computer or email server.
Promotional emails are at least two weeks apart, and usually no more than one per month.

- b. Contact information from individuals and companies who contact MTHCC by email. This is kept on a password-protected email sever and deleted after six months unless it is part of an ongoing business relationship.
- c. Booking forms for space or equipment hire, and entries to the Masham Steam Engine Rally. These are kept securely as hard copies for 12 months, and information is used only for invoicing in the former case, and to invite entries to the following year's Rally in the latter. At the time of writing, invoicing is done by a third party under a service agreement, and they will also observe this policy in relation to MTHCC data.

5. Website

MTHCC may run websites for general information and promotion, and for the Masham Steam Engine Rally. Any such websites are hosted securely, with access only to relevant MTHCC staff on a password-protected basis.

5.1 Personal identification information

MTHCC may collect personal identification from website users only if they fill out a form, fill in a survey with identifying information, or place an order for tickets or services. [N.B. at the time of writing MTHCC does not transact sales via their websites, but may wish to do so in future.] The website is anonymous to users, with no requirement to register or log in.

5.2 Non-personal identification information

MTHCC may collect non-personal information about website users, including the browser name, type of computer and technical information about users' means of connection to the site. The website may use "cookies" to enhance user experience. These are small data files placed on the user's hard drive for record-keeping purposes and sometimes to track information. Users may choose to set their web browser to refuse cookies, or to alert the user when cookies are being sent. In some cases, parts of the website may not function properly for users who have disabled cookies.

5.3 User acceptance

By using MTHCC's website/s, users signify their acceptance of this Data Protection Policy. Continued use of the website/s following the posting of changes to this policy will be deemed acceptance of those changes.

6. Electronic newsletters

If a user opts in to the MTHCC e-mailing list, they will receive emails with information about MTHCC including news, forthcoming events and organisational updates. Detailed unsubscribe instructions are included at the bottom of each email, or users may contact MTHCC by any means and at any time to opt out. MTHCC may use third party service providers to send out newsletters, and may share the following information only in order to personalise emails: email address (for all users), first name and surname (for some users). This information is not available to the third party service provider for any purpose other than MTHCC information sharing.

7. Changes to this privacy policy

MTHCC will review this policy at least biennially, and may update it at any time. If and when this happens, MTHCC will post a notification on the main page of our website and include the information in the next email sent.