

# Hale Community Centre Privacy Notice



Hale Community Centre

At Hale Community Centre we are committed to protecting personal information and we take our responsibilities regarding the security of personal data very seriously. This Privacy Notice explains what personal data we collect, how and why we use it, who we disclose it to and how we protect it

Hale Community Centre is the data controller and we are responsible for your personal data. Any questions regarding this policy and our privacy practices should be addressed to the Centre Manager and can be sent by email to [manager@halecommunitycentre.org.uk](mailto:manager@halecommunitycentre.org.uk) or by writing to Hale Community Centre, 130 Upper Hale Road, Farnham, Surrey GU9 0JH or you can call 01252 722362.

## Who are we?

Hale Community Centre is registered in England as a charity (Charity No 1132822) and as a charitable company limited by guarantee (company number 06872992) whose vision is to see all residents in Hale enjoy social and community cohesion and be empowered to achieve their economic, social and educational goals as part of a strong caring community with the Community Centre at its heart.

## Contact Details

**Full name of legal entity:** Hale Community Centre Limited is a charitable company limited by guarantee (no. 6872992).

**Data Protection Officer:** Cathy Burroughs

**Email address:** [office@halecommunitycentre.org.uk](mailto:office@halecommunitycentre.org.uk)

**Postal address:** Hale Community Centre, 130 Upper Hale Road, Farnham, Surrey GU9 0JH

**Telephone number:** 01252 722362

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.

It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by emailing us at [info@halecommunitycentre.org.uk](mailto:info@halecommunitycentre.org.uk)

## What data do we collect about you?

When using the term "personal data" in our Privacy Notice, we mean information that relates to you and allows us to identify you, either directly or in combination with other information that we may hold. It does not include anonymised data.

We may collect and process the following categories of information about you:

Personal information, including contact details (eg, name, postal address, telephone number and date of birth)

Bank details – name, sort code and account number

When you enter into a contract with us, for example hire one of our rooms – name, address, contact details

The communications you exchange with us, eg when you email us, write a letter or call us

We collect non-personal data such as IP addresses, details of web pages visited and files downloaded. Website usage information is collected using cookies.

When you interact with us on social media platforms such as Facebook or Twitter

When you apply for a job or for volunteering opportunities with Hale Community Centre

### **Sensitive Data**

Sensitive data refers to data that includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. Hale Community Centre may be required by certain funding organisations to collect sensitive data. Hale Community Centre has in place policies and procedures to ensure that your sensitive data is kept secure. Unless required by law or as otherwise described in this Privacy Notice, we do not disclose your personal data to any third party without your prior consent.

Certain roles may require us to collect information about criminal convictions and offences.

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

We collect data about you through a variety of different methods including:

**Direct interactions:** You may provide data by filling in forms on our site (or otherwise) or by communicating with us by post, phone, email or otherwise, including when you:

- request information to be sent to you;
- make accommodation bookings on our website;
- join our projects;
- enter a prize draw, promotion or survey; or
- give us feedback.

**Automated technologies or interactions:** As you use our website, we may automatically collect technical data about you by using cookies

### **How we use your personal data**

We will only use your personal data when legally permitted. The most common uses of your personal data are:

- where we need to perform a contract between us, ie you are hiring our facilities or providing us a service;
- 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 we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal ground for processing your personal data, other than in relation to sending marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by emailing us at [info@halecommunitycentre.org.uk](mailto:info@halecommunitycentre.org.uk)

## How and why we use your personal data

Set out below is a description of the ways we may use your personal data and the legal grounds on which we will process such data. We have also explained what our legitimate interests are where relevant.

We may process your personal data for more than one lawful ground, depending on the specific purpose for which we are using your data.

Purpose/Activity	Type of data	Lawful basis for processing
To register you as a new customer and process the following services: Online accommodation bookings. Information requests. Join our projects/activities.	Identity Contact Financial Transaction Marketing and communications	Performance of a contract with you.
To manage our relationship with you which will include notifying you about changes to our terms or privacy policy and asking you to leave a review or take a survey; to deal with your queries and requests.	Identity. Contact. Marketing and communications.	Performance of a contract with you. Necessary to comply with a legal obligation. Necessary for our legitimate interests to keep our records updated and to study how customers use our facilities/services.
To enable you to partake in a competition or complete a survey.	Identity. Contact. Usage. Marketing and communications.	Performance of a contract with you. Necessary for our legitimate interests to study how customers use our facilities/services, to develop them and grow our business.

To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	Identity. Contact. Technical.	Necessary for our legitimate interests for running our business, provision of administration and IT services, network security, to prevent.  Necessary to comply with a legal obligation.
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences.	Technical. Usage.	Necessary for our legitimate interests to define types of customers for our products and services, to keep our site updated and relevant, to develop our business and to inform our marketing strategy.
To make suggestions and recommendations that may be of interest to you.	Identity. Contact. Technical. Usage.	Necessary for our legitimate interests to develop our products/services and grow our business.
To display advertising on Facebook.	Contact. Usage. Marketing and Communications.	Ensure the processing of our marketing opportunities is available to you.

### **Change of purpose**

We will only use your personal data 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 data for a purpose unrelated to the purpose for which we collected the data, we will notify you and we will explain the legal ground of processing.

We may process your personal data without your knowledge or consent where this is required or permitted by law.

### **Disclosures of your personal data**

Hale Community Centre does not share your data with any other charity, public body or commercial organisation, unless we have to do so either for legal or compliance reasons.

## **Children and vulnerable people**

### Children

We are committed to protecting the privacy of the young people who engage with us. If you are under 16 please ensure you have consent from a parent or guardian before giving us your personal information. Some of our activities request specific information about the age of participants and we may require explicit parental consent for this. We will only ever collect or process any personal information for a child under 13 with explicit parental consent. When we collect information about a child or young person aged under 16 we will make clear the reasons for collecting this information, as well as how the information will be used.

### Vulnerable people

We are committed to protecting vulnerable adults. We provide training to our staff who come into regular contact with centre users to be aware of, and to identify signs of, people in potentially vulnerable circumstances. We work in accordance with our Vulnerable Adults Policy at all times. We may record relevant personal information so that we can respond appropriately in future.

## **Data Security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees or volunteers who have a business need to know such data. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **Data retention**

We will only retain your personal data 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.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction data) for six years after they cease being customers for tax purposes.

We may anonymise your personal data in some circumstances (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

- request access to your personal data;
- request correction of your personal data;
- request erasure of your personal data;
- object to processing of your personal data;
- request restriction of processing your personal data;
- request transfer of your personal data;
- right to withdraw consent.

You can see more about these rights at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you wish to exercise any of the rights set out above, please email us at [info@halecommunitycentre.org.uk](mailto:info@halecommunitycentre.org.uk). You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## Third-party links

Our website may include links to third-party websites. Clicking on those links may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly

## Updates to our Privacy Notice

We will update the Privacy Notice as and when required and we will publish any new version of this Privacy Notice on our website [halecommunitycentre.org.uk](http://halecommunitycentre.org.uk)