



## Privacy and Data Protection Policy

### Your Privacy

Your privacy is important to us. We provide this notice explaining our information practices and the choices you can make about the way your information is collected and used.

### Compliance with the law

The Trustees of the Educational Foundation of Abigail Bailey and Ann Levett aim to comply with the [General Data Protection Regulation \(GDPR\)](#) introduced by the Office of the Information Commissioner in May 2018. The lawful basis on which we collect and process personal information (i.e. for a private individual) is limited to the following:

*6(1)(b) – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract*

As a general principle, we collect and process no other information about individuals and only retain this information for as long as is necessary for our annual audit to be completed. Once our annual accounts have been audited and certified as a true record, we take all practical steps to erase personal information, except where clearly identified later in this policy.

The Foundation has a number of contracts with suppliers of goods and services. The majority of these are with limited companies whose contact information is already in the public domain. However, some may be sole traders, trading from a private address. Details of these contracts are published for transparency purposes, and all invoices from such suppliers are retained and published un-redacted (no details erased or hidden). The Foundation has a legal obligation to demonstrate how its funds have been spent and considers the lawful basis for retaining this information to be:

*6(1)(c) – Processing is necessary for compliance with a legal obligation*

### Our Commitment to Children's Privacy

Protecting the privacy of the very young is especially important. For that reason, Chelveston Village Hall will never collect or maintain information from those we actually know are under 18, and no part of our website is structured to attract anyone under 18.

### Collection of Personal Information from the Village Hall website

When visiting the Village Hall website, the IP address of the device used to access the site, along with the dates and times of access, will be logged by our internet service provider. This information is used by Chelveston-cum-Caldecott Parish Council (who own the web site domain which is hosted by [EUKHOST](#)) to analyse usage trends. Recorded IP addresses are not linked to personally identifiable information. The Village Hall web site does not use cookies or other methods of recording visits to the site.

### Collection and use of Personal Information for Village Hall Bookings

When a booking is made, we collect the following personal information from the hirer to enter into a hire contract:

- First name and surname of person responsible for the hire (*the hirer*)
- Residential address of the hirer
- Email address of the hirer
- Mobile number of the hirer and land line number where available

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This is stored in our bookings database which is hosted by Google (<http://drive.google.com>). This data can only be accessed by the Clerk and Bookings Secretary of the Village Hall. The data is used to prepare the booking Email and contract sent to the hirer using the Village Hall Google Mail account.

The name of the individual or organisation responsible for the booking is entered into the online bookings calendar. The calendar is hosted by Google (<http://calendar.google.com>) and is visible to the public on the Village Hall web site. Only the name of the hirer is shown and no other personal information relating to the hirer is stored with the calendar entry. The name of the hirer is an essential link to the financial transaction associated with the hire. For transparency reasons, it cannot be erased completely from our accounts.

Other than for the recurring bookings, the personal data in the bookings database (other than the name of the hirer) is erased as soon as the annual audit is completed. This is usually by the end of April of the year following the closing of the accounts on 31<sup>st</sup> December. Booking Emails are erased from the Google Mail account at the same time.

The invoice raised for the hire contract is sent via [PayPal](#). We have no direct involvement in the collection of the information necessary to make a payment (e.g. credit/debit card numbers.) We only provide PayPal with the following information:

- First name and surname of person responsible for the hire
- Email address of the hirer

This information is shown on the PayPal invoice. A link to the PayPal invoice is sent to the hirer by Email. The Foundation does not make this information public, nor save a copy of the PayPal invoice. The invoice retained in the Village Hall records shows only the name of the hirer.

Monthly statements from PayPal do show the name of the hirer and their email address. However, the email address is redacted (erased completely) before the statement is published on our web site.

However, PayPal retains records of invoices sent, and payments made, indefinitely, and we are not yet able to erase these. No credit/debit card information is retained. Using the Village Hall PayPal account, the Clerk and Bookings Secretary of the Village Hall can access the archived information, and any address details that the hirer has associated with their PayPal account at the time of payment (if they have used and account). However, this information is never saved by the Foundation and is not routinely accessed. The Foundation has no interest in these details once a payment has been made. This information might only appear if a search has been conducted by the Clerk of the Village Hall in the PayPal archive for a transaction.

No one, other than the Clerk and Bookings Secretary of the Village Hall, has access to the Gmail account, the Google Drive account, nor the PayPal account. All devices that have access to these accounts are password, PIN or finger print secured.

## The Tenancy of School House

When letting School House to new tenants, sensitive personal information regarding the prospective tenant is sent to the Clerk by the property agent by email for review and agreement. This information is not shared or discussed with the Trustees. It is deleted from the Clerk's email account within 30 days. No copies are retained. Once the letting agreements are signed and reviewed, these too are deleted by the Foundation. Our agent retains all the master copies.

The names of our current and past tenants are a matter of public record and may be referenced in the public minutes and accounts of the Foundation. No other details of the tenants are retained in the records. Emails to the Trustees concerning the tenancy do not use the name of the tenants after the first notification that the tenancy agreement has been signed.

## Changes to this Privacy Statement

The contents of this statement may be altered at any time, at our discretion.