

### Introduction

Under the EU General Data Protection Regulations (GDPR) Broad Street Hall [BSH] is required to comply with GDPR and undertakes to do so. BSH understands that GDPR covers both online, electronic and paper copies of any personal information held.

### Definitions

The definitions of terms used in this policy are the same as the definitions of those terms detailed in Article-4 of the GDPR.

*Data Subject - A data subject is an identifiable individual person about whom BSH holds personal data.*

*Contact Information - For the purposes of this Policy, "Contact Information" means any or all of the person's:*

- full name (including any preferences about how they like to be called)
- full postal address
- telephone and/or mobile number(s)
- e-mail address(es)
- social media or online IDs/Usernames

### Principles of the GDPR

BSH will ensure that all personal data that it holds will be:

- processed lawfully, fairly and in a transparent manner in relation to individuals
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed
- accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay
- kept in a form which permits identification of individuals for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

The above principles will be applied to all aspects of personal data held including BSH's online platforms

## **Lawful Processing**

BSH will obtain, hold and process all personal data in accordance with the GDPR for the following lawful purposes.

*In all cases the information collected, held and processed will include Contact Information, as defined above*

## **By Consent**

- People who are interested in, and wish to be kept informed of, the activities of BSH.
- Subject to the person's consent, this may include information selected and forwarded by BSH on activities relevant to those of BSH by other organisations.  
**Note:** *this will not involve providing the person's personal data to another organisation.*
- The information collected may additionally contain details of any particular areas of interest about which the person wishes to be kept informed.
- The information provided will be held and processed solely for the purpose of providing the information requested by the person

## **By Contract**

- People who sell goods and/or services to, and/or purchase services from BSH.
- The information collected will additionally contain details of:
  - The goods/services being sold to, or purchased from the BSH
  - Bank and other details necessary and relevant to the making or receiving of payments for the goods/services being sold to or purchased from BSH.
- The information provided will be held and processed solely for the purpose of managing the contract between BSH and the person for the supply or purchase of goods/services.

## **By Legal Obligation**

People where there is a legal obligation on BSH to collect, process and share information with a third party, such as the legal obligations to collect, process and share with HM Revenue & Customs payroll information on employees of BSH.

The information provided will be held, processed and shared with others solely for the purpose meeting BSH's legal obligations.

## **Employees**

For the purpose of managing an employee's PAYE and other taxation affairs the information collected will additionally contain details, as required by HM Revenue & Customs, of:

- The person's National Insurance Number
- The person's taxation codes
- The person's salary/wages, benefits, taxation deductions & payments
- Such other information as may be required by HM Revenue & Customs.
- Pensions

For the purpose of managing an employee's statutory pension rights the information collected will additionally contain details, as required by BSH's pension scheme of:

- The person's National Insurance Number
- The person's salary/wages, benefits, taxation & payments
- Such other information as may be required by the Pension scheme

### **By Vital Interest**

BSH undertakes no activities which require the collection, holding and/or processing of personal information for reasons of vital interest.

### **By Public Task**

BSH undertakes no public tasks which require the collection, holding and/or processing of personal information.

### **Legitimate Interest**

#### **Closed Circuit TV (CCTV) Recording**

BSH collects video CCTV images of people entering and moving around its premises in order to safeguard from theft and vandalism, as required by the insurers. The information collected is only processed and, where appropriate, shared with other authorities (such as the Police) where it is necessary to investigate a potential crime.

BSH has registered with the Information Commissioners Office that it has CCTV on its premises

### **Individual Rights**

The right of access - The individual shall have the right to obtain from the BSH confirmation as to whether or not personal data concerning him/her are being processed, and, where that is the case, access to his/her personal data by writing to the Board of Trustees

The right to rectification - The individual shall have the right to require BSH without undue delay to rectify any inaccurate or incomplete personal data concerning him/her.

The right to erase/The right to be forgotten - Except where the data is held for purposes of legal obligation or public task the individual shall have the right to require BSH without undue delay to erase any personal data concerning him/her.

The right to restrict processing - Where there is a dispute between the individual and BSH about the accuracy, validity or legality of data held by BSH the individual shall have the right to require BSH to cease processing the data for a reasonable period of time to allow the dispute to be resolved.

The right to data portability - Where data is held for purposes of consent or contract the individual shall have the right to require BSH to provide him/her with a copy in a structured, commonly used and machine-readable format of the data which he/she has provided to BSH and have the right to transmit that data to another organisation without hindrance.

The right to object – The individual shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him/her which is based in a Public Task or Legitimate Interest including profiling based on those provisions.

BSH shall no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the individual or for the establishment, exercise or defence of legal claims.

- Where personal data is processed for direct marketing purposes, the individual shall have the right to object at any time to processing of personal data concerning him/her for such marketing, which includes profiling to the extent that it is related to such direct marketing.
- Where the individual objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

Rights in relation to automated decision making and profiling - Except where it is:

- based on the individual's explicit consent, or
- necessary for entering into, or performance of, a contract between the individual and BSH

the individual shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him/her or similarly significantly affects him/her.

### **Data Controller and Data Protection Office**

The scale and scope of the data collected and processed by BSH does not justify the appointment of a Data Protection Officer.

### **Confidentiality**

BSH will have a Confidentiality Policy which it will make available to everyone on whom it holds and processes personal data.

### **The right to complain**

Individuals have the right to lodge a complaint with the Information Commissioner's Office, the supervisory authority for the UK if they are dissatisfied with the way that BSH is collecting, holding, processing and using their personal data and they feel that reasonable attempts to raise the issues and get them addressed have failed.

### **Additional Information**

In addition to the statutory information that BSH collect, hold and process for the purpose of managing employee, volunteers and hall users, BSH also collect and hold:

- All information an individual or organisation chooses to submit to BSH when they communicate by post, e-mail, messaging, or other form of image-based (photographs), sound-based (sound files) or text-based communication, whether physical (ink & paper) or electronic.
- Copies of any notes that BSH take, whether physical (ink & paper) or electronic, during verbal communications with or between BSH employees and volunteers (telephone; Skype®; Hangouts®).
- Information on what BSH communicate to individuals or organisations by post, e-mail, messaging, or other form of image-based or text-based communication whether physical (ink & paper) or electronic, including information in all ancillary materials (attachments, images, brochures).

**Information security**

BSH take the security of your information very seriously. It complies with the relevant prevailing legislation which requires BSH to have in place appropriate security measures at all times, including where it shares information with others.

Information security includes the digital tools and IT processes used by BSH. All information stored digital will be kept in keeping with the IT Acceptable Usage Policy.

**Responsibilities**

The Board of Trustees is responsible for ratifying and reviewing this policy, they will need to update this policy from time to time as BSH services or legislations change.

**Related Policies & Procedures**

- Confidentiality Policy
- Complaints Procedure
- Disciplinary Procedure
- IT Acceptable Usage Policy
- Social Media Policy

Agreed on [*Date*].....

Signed.....

Name [*Print full name*].....

Position.....