



## **MERRIOTT VILLAGE HALL DATA PROTECTION POLICY**

Registered charity number 1209414

Reviewed: 30 April 2025

Review frequency: Every two years

Merriott Village Hall (MVH) respects the privacy of trustees, staff and users, and understands how important it is that their personal information remains secure. Personal data is protected by legislation, specifically the Data Protection Act 1998 and the General Data Protection Regulations (GDPR) 2018. The MVH Data Controller (Treasurer) is legally responsible for complying with the law.

Data is held for the purposes of managing the Hall. Personal information is collected directly from individuals when they interact with MVH. The information collected will typically include name, postal and email addresses and phone numbers. It can be held electronically or on paper and includes email, booking forms, minutes of meetings and photographs. Photographs will not be openly distributed without the subject being made aware beforehand.

MVH takes the care and control of data seriously and undertakes to protect personal information in a range of ways including password protection, malware and physical security such as locked cabinets. If any item of information being held on behalf of MVH is stolen or hacked, the breach must be reported to the Data Protection Officer (usually the Treasurer).

MVH will retain information only until any statutory obligation has expired. Archives must be kept securely in a locked filing cabinet. Archives may typically be retained for 6 years unless a longer period is specifically authorised by the Chair of Trustees.

Officers of MVH must undertake to destroy or hand over all personal data acquired on behalf of MVH when their position as an officer for the charity ends.

MVH will not sell or share information to third party organisations.

Individuals can obtain a subject access report detailing the information we hold on them without charge. Contact MVH by email on [merriottvillagehall@gmail.com](mailto:merriottvillagehall@gmail.com) or write to the Treasurer. MVH aims to issue an initial response to all enquiries within ten working days. Subject to verification of the identity of the person requesting the information, MVH will offer a full response to all information access requests within one calendar month of receipt.

Any known breach of security where it is likely to result in a risk to individuals must be reported to the Information Commissioner's Office within three days of becoming aware that an incident is reportable.

## **DATA PROTECTION POLICY – CCTV IMAGE RECORDING**

Merriott Village Hall (MVH) recognises a responsibility to protect the building and its infrastructure, visitors, trustees, service personnel and users in respect of safety and security when entering, meeting, working and enjoying the facilities the hall has to offer. To assist with this aim, the trustees endorse the use of a CCTV system which records real-time images both internally and externally via 6 cameras.

High resolution images are retained temporarily within the system for up to 24 days (max.) from the original recording date. Once the selected deadline date is reached (between 12 -24 days), original images are automatically over-written. The recording system is located within a locked cupboard within the hall and keyholder access is limited to 3 MVH trustees / committee members:

1. Chairman
2. Caretaker
3. One other (at present Roger Gilson)

The recording system can only be accessed by one of the above.

Images can be downloaded onto disc or memory stick in the event that there is a clear requirement to provide evidence of a threat to the safety or the security of the buildings or infrastructure, people visiting the hall or its surroundings. Requests will only be considered from bona fide institutions which have a Data Protection Policy relating to the retention and disposal of such images and would typically include the following organisations:

1. Police
2. Merriott Parish Council
3. Somerset Council

In order for a request for images to be provided to such an organisation, at least 2 trustees must grant their permission for the images to be downloaded onto a removal device and thereafter provided to the organisation. Assurances would be sought by MVH to ensure that images provided are routinely destroyed by reference to the Data Protection Policy of the organisation to which any image is provided.

# **PRIVACY, DATA PROTECTION AND COOKIES POLICY**

Merriott Village Hall (MVH) respects the privacy of our supporters and website users, and understands how important it is that your personal information remains secure.

Your personal data is protected by UK legislation, specifically the Data Protection Act 1998, the Privacy and Electronic Communications (EC Directive) 2003 and the General Data Protection Regulation (GDPR) 2018.

MVH takes the care of your data seriously and undertakes to protect your personal information in a range of ways including the use of secure servers, firewalls and modern and secure email marketing systems.

Your data will only be used in the ways described in this privacy policy. This policy is reviewed and updated from time to time. This privacy and cookies policy was last updated April 2025.

## **The type of data we collect**

Personal information is collected directly from users when they interact with MVH and specifically choose to receive further communications from us.

This interaction will typically include contacting us by post, email or telephone to make enquiries about our facilities and events.

The information we collect may include:

Your name  
Postal address  
Email address  
Phone number  
Bank details (for deposit refunds)  
Information necessary to arrange your attendance at an event  
Information necessary to arrange your hiring the hall facilities

If you attend an event at Merriott Village Hall, your photograph may be taken which we may use on our website or social media channels including Facebook. If you do not wish your photograph to be used, you can let us know at the event, or afterwards by contacting the Treasurer, or by email: [merriottvillagehall@gmail.com](mailto:merriottvillagehall@gmail.com)

## **Lawful basis for processing your data**

As a charity, MVH processes all personal data on one of three lawful bases:

1. Consent - where you have given us clear consent to process (record and use) your data for specific purposes
2. Legitimate interests - where the processing is necessary for our legitimate interests, for example, to invoice you for using the hall facilities

3. Legal obligation - where the processing is necessary for us to comply with the law. For example, where we have to maintain records of gift aid donations.

## **Your data protection rights**

Where MVH is processing your data on the basis of consent, you have a right to withdraw your consent at any time.

You can unsubscribe from communications from us at any time by writing to the Treasurer of MVH (name and address on the notice board or website), or by emailing [merriottvillagehall@gmail.com](mailto:merriottvillagehall@gmail.com)

You can obtain a subject access report detailing the information we hold about you at any time. Please write to the Treasurer of MVH (name and address on the notice board or website).

You have the right to be forgotten, and have personally identifiable information erased from our records at any time. Please write to the Treasurer of MVH (name and address on the notice board or website).

MVH aim to issue an initial response to all enquiries within seven working days, and will offer a full response to all information processing requests within thirty working days of receipt.

## **Third parties**

We will not sell your information to third party organisations. We will not share your information with third party organisations, unless required to do so by law, for example to fulfil our obligations to process and record gift aid donations accurately.

## **Retention of your data**

We will retain your information for as long as you have an active relationship with MVH. If you request to receive no further contact from us we will cease sending communications and delete your information from our database after any statutory obligation to retain your records has elapsed.

Any alterations to our policy on the collection or use of data will be posted on MVH website.

## **Data breach process**

We take the security and confidentiality of your data very seriously and maintain accurate and secure records. However, in the event of a breach of our systems, we will comply with the requirements for a data breach as set out by the Information Commissioner's Office (ICO) and GDPR regulations.

In summary, we are aware of the potential risks of a data breach and have a process in place to notify the ICO within 72 hours of the breach where there is a high risk to

the rights and freedoms of the person(s) affected. In this situation we will also inform the person(s) affected without undue delay.

All breaches will be documented and processes and structures reviewed to ensure the continued security of the data we hold.

### **Links to other websites**

Our website may contain links to other websites. Please bear in mind we are not responsible for the content of any website we link to or for the protection and privacy of any data you submit to those websites. We recommend you review their privacy policies before submitting your data.

### **Cookies**

A cookie is a small file placed on your computer's hard drive. We do not use cookies.