



# Privacy Notice Policy

## What This Document Covers

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession. The processing of personal data is governed by the General Data Protection Regulation (the "GDPR"). This notice describes how we collect, store, use and share your personal information. It also explains the rights you have in relation to the personal information that we hold about you and it applies to personal information provided to us, both by you and by others on your behalf.

## Who We Are

The Trustees of the Packington Memorial Hall (PMH) data controller (contact details below). This means it decides how your personal data is processed and for what purposes. When we say 'we' or 'us' in this notice we are referring to Packington Memorial Hall Venue (England & Wales Charity registration number: 521484). When we use "you" or "your", we refer to you as an individual. This policy covers the Hall registered at High Street Packington LE65 1WJ, main contact email: [info@phmv.uk](mailto:info@phmv.uk)

You can use the above information to contact us, with any aspects of your data protection legal rights under EU GDPR or the UK DPA 2018/UK GDPR.

## What Information We Collect

We comply with our obligations under the "GDPR" by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access, and disclosure and by ensuring that appropriate technical measures are in place to protect personal data. In our activities, like many charities, we collect personal information from you. It is possible that you may have multiple types of interactions with us. Mostly this is used to answer enquiries and execute bookings made by you including necessary correspondence to arrange and execute payment for those bookings.

### Who we collect from

### What personal data we collect

Prospective Enquirers

Name, Email, Address, Contact Number

Trustees and Volunteers

Name, Email, Address, Contact Number

Hirers/End Users

Name, Email, Address, Phone Number, Bank Details (where refunds are required for deposit returns)

Sub Contractors

Name, Email, Address, Phone Number, Bank Details (where payment is required for work undertaken)

Website Visitors

Technical information, for example cookies, browser type, and IP address (your computer's internet address), if you use our website or the website of our Saas Partner Hallmaster Ltd. If you make a provisional or confirmed booking, you also become an individual End User of the Hallmaster system.



# Privacy Notice Policy

## Where We Store Your Personal Data

We employ a third party called Hallmaster Ltd to process data relating to bookings, acting as SAAS. Their system is GDPR compliant as detailed on their website [www.hallmaster.co.uk](http://www.hallmaster.co.uk) specifically on the following pages:

<https://www.hallmaster.co.uk/Docs/Hallmaster-licence-agreement.pdf>

<https://www.hallmaster.co.uk/docs/hallmaster-privacy-policy.pdf>

We use Google Workspace and Cloud to provide our document storage and our email system. This helps us provide a more reliable service to you and provides a safe backup of all our business data. They have been assessed as GDPR compliant having the appropriate technical and organisational measures as detailed specifically on the following page:

<https://cloud.google.com/privacy/gdpr>

Our Trustees may need to execute activities such as, among other things, confirming details of your booking, arranging subcontractor work to maintain the building, the processing of your payment details and the provision of licenced bar and associated voluntary staff. By submitting your personal data, you agree to this data processing to execute these tasks. We will take reasonable steps to secure and protect your data in accordance with this privacy policy.

## How We Use Your Information

Depending on your role (Trustee, End user, Enquirer, Subcontractor etc.) we will collect and use the data differently, these are summarised below:

Category	Lawful Purpose
Booking enquiry, account creation, booking confirmation, invoicing and billing, booking information status and updates, customer service, work undertaken	Execution of performance of a Contract
Technical information to ensure that the websites perform as needed and technical issues are resolved.	Legitimate interest.
Anonymised data. Using general and statistical data to identify trends or market research	Legitimate interest
Regulator requests, government requests etc	Legal or Regulatory requirement

## Marketing Preferences

We DO NOT use your contact information for marketing purposes. Our only communications with you will relate to an enquiry you have made, a booking you may wish to place or payment for that booking.

## Telephone Call Recording

We do not record telephone calls.

## Security

We take on-line data security very seriously. We know how much data security matters to all our end users, contractors trustees and visitors. We will take all appropriate steps to protect it. We do this in the following ways:



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## Trustee access to data

To protect your data, only specific individuals have access to your personal data and we use a third party GDPR complaint system to process that data. Those trustees who do have access to your personal information are restricted by their specific roles and general access to all data is not permitted.

## Browser & Web Server

We use Transport Layer Security (TLS) to encrypt data transmissions between your browser and our web server, to ensure that all personal and transactional information is protected from eavesdropping, tampering or alteration. We do not ask for any bank details over the web or hold them within the web based Hallmaster system.

## Payments, PCI/DSS

Protection and security of the payment system itself is important. We prefer to accept payments via bank transfer instigated by you through your bank and complete the transaction(s) securely behind protected firewalls and encrypted connections between your bank and ours. Returned deposits are processed by bank transfer only and any details are securely destroyed immediately after use.

When the bar is requested as part of a booking, payments are made by cash or card via a third party called Zettle. The Zettle service is provided by PayPal (Europe) S.à.r.l et Cie S.C.A, deemed authorised and regulated by the Financial Conduct Authority. Zettle is a PCI certified company, this means they comply with all the requirements of the Payment Card Industry Data Security Standard (PCI DSS). By using this third party we can ensure a secure network for all our end users, protect cardholder data and react quickly to vulnerabilities if they appear.

## Technology

Hallmaster Ltd 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, they limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. The Third Parties will only process your personal data on their instructions, and they are subject to a duty of confidentiality. They have put in place procedures to deal with any suspected personal data breach and will notify the Trustees and any applicable regulator of a breach where we are legally required to do so.

Further information can be found within the below documents:

<https://www.hallmaster.co.uk/Docs/Hallmaster-licence-agreement.pdf>

<https://www.hallmaster.co.uk/docs/hallmaster-privacy-policy.pdf>

## Do We Sell Your Information To Third Parties?

### External Organisations

We do not share your data with anyone outside of the Charity, our Bank (Lloyds) or Hallmaster Ltd. If you click on any links which take you outside of the Hallmaster website system we encourage you to read the privacy notice of every website you visit.

In some circumstances, it may be necessary to cooperate with authorities in relevant countries in the case of fraud, regulatory or legal actions. We abide by those actions based on our legal review. Under no circumstances do we permit the selling of your personal data to other organisations.

### International Data Transfers

Neither Packington Memorial Hall Venue Trustees or Hallmaster Ltd transfer your personal data outside the European Economic Area (EEA)



# Privacy Notice Policy

## How Long Do We Keep Your Data?

In order to provide a high-quality of service, it is necessary that we keep some data to continue to service your needs. As such, the following retention periods apply:

Types of Data	Purpose(s)	Retention Period
Prospective Enquirers	For potential bookings and communicating venue details.	18 months
Trustees/Volunteers	Legal Obligation	As required by Charities Commission
End Users, Sub Contractors	Execution or performance of a booking contract and or maintenance work	Either 10 years after the last transaction takes place, or indefinitely if any illegal or fraud activity is detected, or it is additionally required for legal or regulatory purposes
Accounts and legal data	Execution or performance of account reporting	As required by UK laws. Normally 7 years.

If the Trustees cease to use the Hallmaster Booking System Hallmaster shall delete all End User Data in relation to any Venue Account which is inactive and/or any inactive End User Bookings/invoices over 18 months old. Hallmaster is not a storage facility for Venue/ Administrator / End User Data.

## Your Rights

### When We Act as a Data Controller

The Trustees of the Packington Memorial Hall Venue are the data controller. This means it decides how your personal data is processed and for what purposes. If the booking is directly through us (phone, post, email, Hallmaster website) then as the data controller we will respond to your request. We may need to discuss your enquiries with the data processor in order to respond. Under EU GDPR and UK DPA 2018 (UK GDPR), you have certain data protection rights.

### Right to Information/Notification

This right provides you with the ability to ask us for information about what personal data we hold about you, how it is being processed and the reasons for that processing. If we ever experience a data leak that could have significant negative consequences for your personal privacy rights and freedoms, then you as an End User will be personally informed.

### Right to access

This provides you with the ability to get access to your personal data that is being processed. You can request to see or view your own personal data, as well as to request copies of the personal data if you do not already have a copy, or you do not know it. You may also use a third party to make the request, and we will ask for authorisation proof (power of attorney etc.) if needed.

### Right to rectification

This right provides you with the ability to ask for modifications to your personal data in case you believe that the personal data is inaccurate. We are happy to do this via our Trustees or via the Data Privacy Office contact information.

### Right to withdraw consent

This right provides you with the ability to withdraw a previously given consent for processing of your personal data. The request requires us to stop the processing of that data for that specific purpose in the future. For us this would mean we were unable to process and booking required in the future.



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## Right of Erasure/Right to be forgotten

This right allows you the ability to ask for the deletion of your data. This will generally apply to situations where we no longer have an end user relationship with you and the data has not been deleted already. In some cases, we have a legal obligation to keep certain data (invoices, financial records etc.) and therefore this right is not an absolute right.

## Right to object

This right provides you with the ability to object to the processing of your personal data. For example, you can also ask for your data not to be processed for scientific or historical research purposes (if relevant) unless it is necessary for public interest reasons. However, this is also not an absolute right, as we may have legal, regulatory, contractual, or legitimate interest processing reasons to consider also.

## Right to object to automated processing/automated decision

You can also object to a decision that is made automatically, and to have that decision reviewed by a person. This is usually used for credit agreements if you believe that the decision does not account for unique personal circumstances.

## Right to Data Portability

If you have consented or contracted to provide us personal information and our processing is automated, then you can ask for that data to be made portable. However, at present there is no standard on which this portability occurs to allow easy transfer and we do not have partners that would use that data in this way

## Escalation to Your Supervisory Authority

If you are unhappy with our processing of your personal data, you also have the right to lodge a complaint, at any time, with the relevant supervisory authority in the country where you live, or as below:

UK: Information Commissioner's Office (ICO)

<https://ico.org.uk/make-a-complaint/>

If you live outside the United Kingdom, your complaint will remain on file within your country, but will be addressed by one of the data authorities listed above.

## Changes to this Privacy Notice

Any changes we may make to our Privacy Notice in the future will be posted on this webpage and, where appropriate, notified to you. The new terms may be displayed on screen, and you may be required to read and accept them to continue your use of our Website.