



Data Protection Policy

Purpose

This policy sets out Quinton Memorial Hall's commitment and procedures for protecting personal data. Trustees regard the lawful and correct treatment of personal information as very important. We recognise the risks to individuals of identity theft and financial loss if personal data is lost or stolen.

This document sets out the principles and processes that are followed to ensure compliance. The trustees of QMH are jointly responsible for compliance.

Lawful Basis for Processing Data

Data is processed in pursuit of the legitimate interests of Quinton Memorial Hall, namely managing the hall, recording bookings, managing finances, invoicing, recording trustee information.

Principles

The following principles are followed:

- The only data collected from hirers is that needed to administer their booking(s)
- Personal data is not used for any purpose other than administering bookings and managing finances.
- Data is not shared with any other organisation
- Data about hirers is deleted from systems on a regular basis and only retained if the hirer has a current or recent booking
- Hirers are made aware in a Data Privacy Notice of the collection of their data, the use made of that data and their rights in respect of that data

Processes

Personal data relating to hirers is collected via a paper booking form and/or the online booking system. It is held in digital form within the booking system or as email messages. QMH, as Data Controller, has confirmation from the organisation hosting and processing the data that their controls and processes comply with GDPR requirements.

Personal information held in the booking system and in emails is deleted on a regular basis.

Emails containing client details are deleted by the booking clerk no later than 2 years after the event has taken place. Paper booking forms are destroyed on a regular basis, no later than 1 year after completion of the booking.

Booking records on the online booking system are assigned to QMH as the client after 2 years (i.e. the booking record shows the client as QMH) and are deleted entirely when the booking reaches 3 years old. Client details are automatically deleted from the system if the client has not made a booking in the previous 24 months. The system updates at least once a month.

Compliance checking of the deletion of computer records/destruction of paper booking form will be undertaken annually. Compliance will be recorded in the summary at the end of this policy.

Bank account information may be collected from hirers if a deposit has been paid and will need to be returned by BACS. That information is used to refund the deposit payment via online banking. Financial details are deleted by QMH within 12 months of the transaction completing.

Hirers have rights regarding their data and these are explained in the Data Privacy Notice, which is issued to all new hirers and is available on the QMH website. On request, QMH will provide hirers with the information held about them and will correct any errors notified. If a hirer requests that all data held about them be deleted, QMH will do so as soon as possible but any current bookings made by the hirer will then be cancelled. Data would then be recollected if a further booking is made subsequently.

Deletion of Financial Records

Financial records will be deleted after 6 years

Security

Devices used by hall management to hold data, such as tablets, pc's and mobile phones must be kept secure and should be password protected to reduce the risk of a data breach. Access to the online booking system is password protected. QMH Trustees who handle personal data will be reminded of these requirements as part of the annual compliance check, which will be minuted

Adopted on: 21 January 2020

Last reviewed: March 2024

Next review due: January 2025

Annual Compliance Check

Last Compliance Check	Verified by
March 2021	Kath Heirons
February 2022	Kath Heirons
November 2023	Kath Heirons
March 2024	Kath Heirons

Table of amendments

Date	Amendment
January 2021	Addition of Annual Compliance Check confirmation table
January 2022	No amends required
January 2023	No amends required
January and March 2024	A bug was found in the system which meant client records had not been deleted. This bug was fixed and the client list was updated. Policy updated to correctly state the timescale for automatic deletion of records by the system and the deletion of emails containing personal data. Treasurer, invoicing and booking clerks asked to confirm that where personal data has been retained, records have been deleted in accordance with this policy, devices to be password protected.