



EFFINGHAM VILLAGE RECREATION TRUST

PRIVACY NOTICE

[Policy Document 44b]

1. Data Controller

Effingham Village Recreation Trust ('the Charity'), through its Trustee, acts as the Controller of the personal data that it holds. Personal data is any information relating to an identified or identifiable natural person. The Charity processes its data without using the services of a third-party Data Processor. The Controller can be contacted by writing to:

The Trustee,
Effingham Village Recreation Trust,
King George V Hall,
Browns Lane,
Effingham,
Surrey KT24 5ND

2. Purpose and Lawful Basis

The Charity processes personal data only for the purpose of fulfilling its lawful obligations and exercising its lawful powers in the course of complying with its Governing Scheme in a manner consistent with the provisions of the Charities Act 2011 and guidance from the Charity Commission and the Information Commissioner's Office. All such processing is therefore carried out in the legitimate interests of the Charity.

3. Legitimate Interests

The Charity has determined that Legitimate Interests shall be the lawful basis for its processing of personal data. These interests are concerned with the following:

3a. Governance

The Charity has a legitimate interest in processing personal data for the purposes of maintaining communication among and members of the Trustee and of the Executive Board; for developing policies, strategies and statistical analyses; for discharging its obligations in respect of the auditing or independent examination of its accounts and of making annual returns to the Charity Commission; and for preserving the documented history of the Charity on behalf of the residents of the Parish of Effingham, the residents being the intended principal beneficiaries of the Charity as specified in its Governing Scheme.

3b. Employment

The Charity has a legitimate interest in processing personal data for the purpose of discharging its duties as an employer including recruitment, payroll processing, PAYE, staff appraisal and all the other provisions of its Human Resources Policy.

3c. Trading

The Charity has a legitimate interest in processing personal data for the purpose of conducting its essential business by way of hiring its facilities, receiving income from hirers and paying suppliers and contractors for goods and services.

The Charity has conducted and retained in its files a Legitimate Interests Assessment in which it has identified the relevant personal data and the processing of it, has applied appropriate tests of purpose, necessity and balance and has explained and recorded its resulting decision to choose legitimate interests as the appropriate lawful basis.

4. Categories of Personal Data

The Charity does not pro-actively collect personal data. Personal data is held for three categories of person, as follows.

4a. Members of the Trustee and of the Executive Board

This data consists of contact details and, in some cases, birth dates or National Insurance numbers.

4b. Employees

This data consists of contact details, references, curriculum vitae, details about salary, taxation, National Insurance, workplace pensions, medical notes and banking.

4c. Persons other than Trustee/Board Members or Employees

This data includes contact details of the Charity's hirers, suppliers and contractors and, in some cases, their bank account numbers supplied for payment purposes; the data in this category also includes general correspondence and CCTV imagery.

5. Recipients of Personal Data

Contact details may be conveyed for legal purposes to the Charity Commission and the Charity's accountants. Employee details may also be provided to HMRC and the Charity's payroll service provider. Contact details may also be contained in the Charity's booking and invoicing software.

Bank account details of hirers, suppliers and contractors may be conveyed to the Charity's bankers in order to process payments.

Personal data in correspondence sent to the Charity may be conveyed to its legal advisers if any legal or judicial process requires that.

Personal data within CCTV imagery acquired by the Charity may be supplied to insurers or to the Police if the security of the Charity or the work of the Police or some judicial process requires that.

Your personal data will never be intentionally given by the Charity to any parties except those for whom it is necessary in the Charity's legitimate interests.

6. Retention of Personal Data

The Charity has a legal duty under the Taxes Management Act 1970 to retain for at least six years all taxation records, including those for P45, P60, pension and redundancy, of its employees.

The Charity has a legal duty under the Charities Act 2011 to retain for at least six years all its accounting records, including all invoices; the latter will usually contain hirer or supplier contact details and, in some cases, bank account numbers.

The Charity may retain some personal data for periods longer than statutory ones if it believes this to be necessary in pursuing its legitimate interests.

The Charity acknowledges that in the case where it retains personal data for longer than a statutory period the rights of the data subject under the General Data Protection Regulation to require such data of theirs to be deleted from the Charity's records may outweigh the Charity's legitimate interests in retaining that data.

7. Use of Cookies

The Charity's website is hosted by Preface Studios Ltd of Farnham and employs no cookies.

8. Data Protection

The Charity has a Data Protection Policy in place to ensure that your personal data is maintained securely while in its possession.

9. Your Rights

You have the right to issue a Subject Access Request to the Charity requesting a copy of your personal data in its possession. (Note that in almost all cases this will consist of nothing more than your contact details or a bank account number or correspondence that you have yourself previously supplied in the course of doing business with the Charity.) If you believe that the data held is incorrect then you can request that it be corrected or deleted. If you wish to object to our holding or processing of your personal data then please contact the Charity. If you are not satisfied with the Charity's response or believe it is processing your personal data not in accordance with the law then you can complain to the Information Commissioner's Office at <https://ico.org.uk/>.