

Hebden Bridge Community Association

Privacy Policy

Hebden Bridge Community Association (“We”, “Us”) are committed to protecting and respecting your privacy.

We take our duty to processing your personal data very seriously. This policy tells you how and why we collect information, how we use it and what controls we have in place to protect your personal data.

We may change this document from time to time to reflect the latest view of what we do with your information. Please check back frequently: you will be able to see if changes have been made by the Version Number / Version Control section at the end of the Policy. We will also circulate the latest version at least annually.

This Privacy Policy is intended to cover the data we hold from Business Tenants, Business Associates, Room Hirers, Members, Contractors and Suppliers: some aspects are specific and others are general and applicable to all.

In addition to this Privacy Policy we have specific Privacy Notices for Staff and for Volunteers & Trustees.

Hebden Bridge Community Association's Data Promise

In order to deliver our work it is necessary for us to securely hold and carefully use your data.

We understand that you have trusted us with your personal data so we will only use your data where we have a genuine and legitimate reason and we are not harming any of your rights and interests.

We will never at any time sell, trade or rent your details to third parties.

It is your choice how we use your data and how we contact you.

You may change the way in which you receive information from us at any time:

- Email: admin@hebdenbridgetownhall.org.uk
- Telephone: 01422 417300
- Post: Hebden Bridge Community Association, The Town Hall, St George’s Street, Hebden Bridge, HX7 7BY

Our office hours are Monday – Friday, 9am – 5pm

If you have any concerns about how we may use your personal data, please feel free to contact us and we will do our very best to ensure that your needs and preferences are met.

About us

Hebden Bridge Community Association is a charity registered in England and Wales (Charity No 1127597) and a Company Limited by Guarantee registered in England (company No. 06685276) at The Town Hall, St George’s Street, Hebden Bridge, HX7 7BY.

This policy is also applicable to our trading subsidiary The Town Hall Café Ltd (registered company number 09981542) a wholly owned subsidiary of Hebden Bridge Community Association which donates any surplus to Hebden Bridge Community Association.

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Personal data we collect

We use your personal data to keep in touch with you, to deal with room bookings and to provide our business tenant and business associate services in the Town Hall.

We will only ever collect, store and use your personal data when we have an identified purpose and reason to do so.

From time to time we will collect basic personal data about you like your name, postal address, telephone number, email address and your bank details (if you are donating to us).

We also collect information about you that helps us to get to know you better. This may include:

- your contact preferences
- ways you've helped us through volunteering your time
- records of events you've attended, or campaigns or activities that you've been involved in
- records of donations you've made towards fundraising appeals

If an accident or incident occurs on our property then we'll keep a record of this (which may include personal data and sensitive personal data).

Why we collect Personal Data

We collect your personal data to enable us to contact you to:

- Perform a contract or for administrative purposes (such as a renting one of our business units, one of our rooms, as a business associate, fulfil membership obligations or legal requirements);
- Inform you about our activities or events, campaigns and fundraising appeals, provide news updates relating to our work, obtain feedback, pass on information from third parties.

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We may also process your data when we believe there is a legitimate interest to do this and when these interests do not override your rights as an individual. Those legitimate interests include providing you with information on our appeals, services and products, fundraising, newsletter requests, feedback, and other activities. Please see the section on 'Legitimate Interests' for more information.

We do our very best to ensure we only use your information for the purpose or purposes it was collected for.

How we use your data

a) Administration or contractual purposes

We use personal data for administrative purposes including;

- maintaining databases of our volunteers, members and supporters;
- providing any membership benefit(s);
- fulfilling an order for goods or services (whether placed by email, over the phone or in person);
- fulfilling a contractual agreement between us (such as a licence to occupy a business unit or use our business lounge)
- helping us respect your choices and preferences (e.g. if you ask not to receive marketing material, we'll keep a record of this)
- receiving donations (e.g. direct debits or gift-aid instructions);

b) Members mailings

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Mailings are provided as a benefit of your membership of Hebden Bridge Community Association.

We send these out by email regularly (unless you specifically ask us not to). Please be aware that our member mailings may from time to time include information about third party's events and activities. We do not provide your personal data to anyone else including these third parties. You can choose to unsubscribe from our members mailings and still be a member. If you would like to stop receiving one of our member mailings, you can contact us to do so at:

- Email: admin@hebdenbridgetownhall.org.uk
- Telephone: 01422 417300
- Post: Hebden Bridge Community Association, The Town Hall, St George's Street, Hebden Bridge, HX7 7BY

c) Privacy

We will also hold information about you so that we can respect your preferences for not being contacted by us.

d) Send you information about our work and ask your opinion

We use personal data to communicate with our supporters, to promote Hebden Bridge Community Association and to help with fundraising. This includes keeping you up to date with our news, updates, events, activities and from time to time fundraising appeals. We also seek your feedback on how we are doing. You can decide not to receive these communications or change how we contact you at any time.

Processing of data under GDPR

Under the new data protection laws starting in May 2018 we must have a lawful basis for processing your data for 'direct marketing' purposes.

These include:

i) Opt-in consent

This is where you have given us express permission to contact you by particular communication channels. We use opt-in consent to send you the information listed above by mail, email, text message (SMS) or telephone (if you are registered with the Telephone Preference Service)

ii) Legitimate interest

This is where we have identified a genuine and legitimate reason for contacting you, which crucially does not override your rights or interests. We may use legitimate interest to send you relevant information by post or telephone (if you are not registered with the Telephone Preference Service, and you have given us your telephone number).

We respect your right to update the way we get in touch with you about our work at any time.

Legitimate interests

Broadly speaking Legitimate Interests means we can process your personal information if we have a genuine and legitimate reason and we are not harming any of your rights and interests.

This means that when you provide your personal details to us we use your information for our legitimate business interests to undertake and promote our work. Before doing this, though, we will also carefully consider and balance any potential impact on you and your rights.

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We will process the personal information you have supplied to us to conduct and manage our business to enable us to give you the most appropriate marketing, information and service and provide the best and most secure experience. These are what we consider to be our 'Legitimate Interests'.

Examples of where we would apply legitimate interests include:

- Marketing communications: We may in the future send postal marketing, that includes;
 - information about our activities and fundraising activities which further the aims and objectives of the Association;
 - highlighting Hebden Bridge Community Association membership information;
 - volunteering opportunities and how you can help support us in different ways; and
 - leaving a legacy.
- Your best interest: Processing your information to protect you against fraud when completing financial transactions, and to ensure our systems are secure.
- Personalisation: Where the processing enables us to enhance, modify, personalise or otherwise improve our services and communications for the benefit of our supporters.
- Due Diligence: We may need to conduct investigations on supporters, suppliers and customers to determine if those companies and individuals have been involved or convicted of offences such as fraud, bribery and corruption.

This in no way overrides your right to tell us not to contact you.

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Volunteering with us

If you are a Hebden Bridge Community Association volunteer, we collect your personal data so that we can keep in touch with you about, for example:

- Information about forthcoming Volunteer events including meetings
- Enabling us to compile the rota for any volunteering tasks

As defined by the Information Commissioners Office, the lawful basis for processing your data is 'contractual' where administering your volunteer records and 'legitimate interest' when sending you information about our work.

Your interests

When we process your personal information for our legitimate interests, we will consider and balance any potential impact on you and your rights under data protection and any other relevant law. Our legitimate business interests do not automatically override your interests – we will not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

For more information about your rights, please see **Your Rights** below.

Remember, you can change the way you hear from us or withdraw your permission for us to process your personal details at any time by contacting us (see below).

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How we obtain your details

We may collect your personal information in a number of ways:

- When you provide it to us directly
- When you provide permission to other organisations to share it with us or you have given it to a third party and you have provided them permission to pass your information on to us

Holding your data securely

All the personal data we process in paper form is held securely at our premises in Hebden Bridge and processed by our staff in Hebden Bridge in accordance with guidance issued by the Information Commissioner's Office.

Our data is held on a Cloud Server managed by our IT support company Razorblue.

We follow strict internal procedures that must be followed in relation to collecting, holding and using personal data.

We will only use and store information for as long as it is required for the purposes it was collected for. We continually review what information we hold, and delete securely what is no longer required.

Data retention

We hold your information only as long as necessary, specific to the type of information held and subject to legal requirements including financial audits and for tax purposes. If you decide not to support us any more or request that we have no further contact with you, we will keep some basic information in order to avoid sending you unwanted materials in the future.

We have a comprehensive Document Retention Policy which we can supply on request and is available on our website here:

<http://www.hebdenbridgetownhall.org.uk/content/library>

Payment Security

Hebden Bridge Community Association does not take any financial data via our website.

Hebden Bridge Community Association complies with the payment card industry data security standard (PCI-DSS) published by the PCI Security Standards Council, and will never store card details.

CCTV

The Town Hall in Hebden Bridge has CCTV and you may be recorded when you visit it. CCTV is there to help provide security and to protect both you and Hebden Bridge Community Association. CCTV will only be viewed when necessary (e.g. to detect or prevent crime) and footage is only available to us for a period of 6 months unless it is flagged for review.

Hebden Bridge Community Association complies with the Information Commissioner's Office CCTV Code of Practice, and we put up notices, so you know when CCTV is in use.

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We have a separate CCTV policy which we can supply on request and is available on our website here:

<http://www.hebdenbridgetownhall.org.uk/content/library>

Find out what information we hold on you

The Data Protection Act allows you to have access to information held about you and, where appropriate, to have it corrected or deleted. This will be provided to you in writing within 30 days of receiving your request. There is no charge to you for provision of this information.

Sharing your information

Hebden Bridge Community Association will **never** at any time sell, trade or rent your details to third parties.

In the future we may employ carefully selected third parties to provide services on our behalf, including undertake fundraising, sending mailings, marketing communications and for research purposes. We will only use a third party where it is more cost effective for the charity to do so or we are unable to facilitate this activity internally. Please be reassured that we would ensure any company delivering services on our behalf are equally vigilant about safeguarding your data and any such activity will be subject to data processing agreements.

We only disclose information to third parties or individuals when obliged to by law, for purposes of national security, taxation and criminal investigations.

Children & Young People

If you are under 18 please ensure you obtain consent from the person who has Parental Responsibility (your parent or guardian for example) **before** sending any personal information to Hebden Bridge Community Association.

Please note that we will not knowingly market to or take orders for goods or services from persons aged under 18 years.

As a parent or guardian we encourage you to be aware of the activities in which your children are participating, both offline and online. If your children voluntarily disclose information, this may encourage unsolicited messages. We suggest that you discourage your child from providing any information without your consent.

Your rights

- The right to be informed - This privacy notice outlines how we capture, store and use your data. If you have any questions about any elements of this policy, please contact us.
- The right of access - If you wish to obtain a record of the personal data we hold about you, through a Subject Access Request, we will respond within one month.
- The right to rectification - If we have captured information about you that is inaccurate or incomplete, we will update it.
- The right to erase - You can ask us to remove your personal details from our records.
- The right to restrict processing - You can ask us to stop using your personal data.

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- The right to data portability - You can ask to obtain your personal data from us for your own purposes.
- The right to object - You can ask to be excluded from marketing activity.
- Rights in relation to automated decision making and profiling - We respect your right not to be subject to a decision that is based on automated processing.

For more information on your individual rights, please see the Information Commissioner's Office:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

Making a complaint

Hebden Bridge Community Association want to exceed your expectation in everything we do. However, we know that there may be times when we do not meet our own high standards. When this happens, we want to hear about it, in order to deal with the situation as quickly as possible and put measures in place to stop it happening again.

We take complaints very seriously and we treat them as an opportunity to develop our approach. This is why we are always very grateful to hear from people who are willing to take the time to help us improve.

All complaint information will be handled sensitively, in line with relevant data protection requirements.

For further assistance with complaints regarding your data, please contact the Information Commissioner's Office, whose remit covers the UK.

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF, Telephone: 0303 123 1113, Email: casework@ico.org.uk

Our use of cookies

Our website uses cookies, as almost all websites do, to help provide you with the best experience we can. Cookies are small text files that are placed on your computer or mobile phone when you browse websites.

Our cookies help us:

- Make our website work as you'd expect
- Remember your settings during and between visits
- Improve the speed/security of the site
- Allow you to share pages with social networks like Facebook & Twitter
- Continuously improve our website for you

We do NOT use cookies to:

- Collect any personally identifiable information (without your express permission)
- Collect any sensitive information (without your express permission)
- Pass personally identifiable data to third parties
- Pay sales commissions

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There are two types of cookie you may encounter when using this site:

- First party cookies: these are our own cookies, controlled by us and used to provide information about usage of our site
- Third party cookies: these are cookies found in other companies' internet tools which we are using to enhance our site

Links to other external websites

Hebden Bridge Community Association is not responsible for the privacy practices or the content of any other websites linked to our website or circulated to you in member mailings. If you have followed a link from our website or mailings to another website you may be supplying information to a third party.

Contact us

If you wish to talk about anything in our privacy policy, or the information we hold about you or make changes to your data please do get in contact with us:

- Email: admin@hebdenbridgetownhall.org.uk
- Telephone: 01422 417300
- Post: Hebden Bridge Community Association, The Town Hall, St George's Street, Hebden Bridge, HX7 7BY

Our office hours are Monday – Friday, 9am – 5pm

Remember, you can change the way you hear from us or how we process your personal data at any time.

VERSION CONTROL			
Date	Version Number	Originator	Amends
May 2018	Version 1	Graham Mynott	