

DATA PRIVACY NOTICE

Version 1.00 10/5/2018



Bemerton Community Ltd

1. Your personal data – what is it?

Personal data is any information (either electronic or on paper) relating to a living individual who can be identified from that data. The way we deal with personal data is governed by the General Data Protection Regulation (GDPR).

2. Who are we?

The Trustees of Bemerton Community Ltd manage the converted church building of St John's in Lower Bemerton, Salisbury for shared community use. Bemerton Community Ltd is a company limited by guarantee (reg. no. 7098771) and a registered charity (no. 1136873). Bemerton Community Ltd are the data controller (they make decisions on how your personal data is processed and for what purposes).

Details of how to contact us are at the end of this statement.

3. How do we process your personal data?

Bemerton Community Ltd complies with its 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.

We use your personal data for the following purposes: -

- To enable us to make best use of St John's Place (SJP) by making it available for school, community and church use, and by keeping track of this through bookings;
- To administer membership records of the Friends scheme;
- To fundraise and promote the interests of the charity;
- To manage our employees and volunteers;
- To maintain our own accounts and records (including the processing of gift aid applications);
- To inform you of news, events, activities and services running at St John's Place;

4. What is the legal basis for processing your personal data?

We hold data for the following purposes:

- **SJP Booking Information** This is the information we need for the day-to-day running of SJP. We hold names and contact details for those with provisional and confirmed bookings. We hold this data, and it is shared as needed with Trustees and employees, as part of our legitimate interests to efficiently manage the premises and communicate with those who use it. There is no disclosure to a third party without consent.
- **Contractual data** Examples include data we need to carry out the contracts of employment with our staff and signed forms such as Gift Aid declarations. The legal basis for holding this information is that processing is necessary for carrying out obligations under employment, social security, or social protection law, or a collective agreement;
- **Information to enable the safe running of Community events** Examples include information about health conditions and next of kin contact details which are collected for Bemerton Live. Such details are held securely at SJP and used by the organiser of the relevant event only if and when required. The legal basis for holding this data is the vital interests of the data subject.
- **Communications about SJP events** An email list is held using the Mailchimp platform and this is used by selected Trustees, employees and, where appropriate, organisers of community events held in SJP to enable us to keep people up to date with news and events at SJP and in the wider community. All emails have been obtained from those who wish to be kept informed of events happening at SJP, and Mailchimp is used to send out communications, which gives subscribers the right to opt out and to select those email types which will be of interest to them. The legal basis for holding this data is the consent of the data subject and the legitimate interests of SJP to promote the use of the premises. SJP use Mailchimp to send out communications as above, and data is held on that system under the terms of Mailchimp's Privacy policy, available on their website at: <https://mailchimp.com/legal/privacy/>

5. Sharing your personal data

Your personal data will be treated as strictly confidential and will only be shared with other Trustees and employees of St John's Place as is necessary for the smooth and efficient operation of the premises. We will only share your data with third parties with your consent.

6. How long do we keep your personal data?

We intend to keep personal data only for as long as is required: as a relatively new organisation we currently keep historic records since the building opened in May 2016. We will be reviewing relevant guidance and will be updating our own policies and procedures shortly to take account of this.

Where legal requirements apply, for example for gift aid declarations and associated paperwork which need to be held for up to 6 years after the calendar year to which they relate, these requirements will be adhered to.

7. Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data: -

- The right to request a copy of your personal data which the Trustees of Bemerton Community Ltd holds about you;
- The right to request that the Trustees of Bemerton Community Ltd correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary for the Trustees of Bemerton Community Ltd to retain such data;
- The right to withdraw your consent to the processing at any time
- When we are processing data because you have given your consent, or to perform a contract with you, you have the right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (this is known as the right to data portability).
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- When we process data to provide you with information about St John's Place (marketing), in order to carry out our work (legitimate interests) or to produce research statistics, you have the right to object to the processing of personal data, (where applicable)
- The right to lodge a complaint with the Information Commissioners Office.

8. Photographic images

We may wish to use photographs and occasionally video recordings, to both record and publicise our work. Where this is the case, photographs taken at a large event are considered public domain and permission is not required, even for those in the foreground. It is considered these photographs contribute to Bemerton Community Ltd's legitimate interest to promote knowledge and use of the building.

When an image is of a specific person or persons, we will use a written consent form to gain the person or parent's permission appropriately. Such consent forms will contain full details of how and where such images are to be used. Pictures, wherever displayed, will not reveal unnecessary information and, in the case of under 18s, their full name or any other details. Such consent will have a 'shelf-life' of two years recorded in the agreement and images will not be used after this period.

9. Website

The SJP website is www.stjohnsplace.uk and this website is currently held on Yola. Bemerton Community Ltd do not use Cookies (a small piece of information that is placed on your computer when you visit certain websites) on their own website and have no plans to do so. However the underlying platform may use Cookies to improve the visitor experience, as may websites which are linked to from the SJP site. Yola's privacy policy is held at <https://www.yola.com/privacy-policy>.

10. Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Protection Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and

setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

9.Changes to our privacy policy

Any changes we may make to our Privacy Notice in the future will be posted on this page and the revision number will be changed in the heading of this document.

Revision number	Date	Changes from previous revision
1.0	10.05.2018	First version

10. Contact Details

To exercise all relevant rights, queries of complaints please in the first instance contact the Trustees of Bemerton Community Ltd through their registered contact details and office Telephone: 01722 502039, Email: mackayjy@hotmail.com Address: Myrtle Cottage, Church Lane, Salisbury SP2 9NR

You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.