

THE CLIFFE HALL DATA PROTECTION REGISTER OF SYSTEMS

Last Updated: 05/06/2023

DEFINITIONS

Cliffe Hall	means The Cliffe Hall owned by The Cliffe Feoffees charity
GDPR	means the General Data Protection Regulation
Responsible Person	means The Hall Manager of The Cliffe Hall
Register of Systems	means a register of all systems or contexts in which personal data is processed by The Cliffe Hall

In accordance with the General Data Protection Regulation which came into force on 25 May 2018, this document sets out the approach of The Cliffe Hall to the collection, use and management of the personal data of its members under the following headings:

1. The data we collect and in what way
2. How the data are stored and who has access to them
3. Sharing the data
4. Purpose for which the data are used
5. Data removal and archiving

1. THE DATA WE COLLECT AND IN WHAT WAY

Hire Agreements: When an individual calls The Cliffe Hall with a view to hiring the Hall we do not keep data on the call. If the individual wishes to pursue or proceed with a hire, we ask them to email us—either direct or via our contact forms on our website which do not save any data online, nor do we use any cookies to store any data about anyone. We then send documents to them by email and ask them to fill in a Hire Agreement (PDF document) which requires them to give their full name, address, email, telephone number and the activity, dates and times of their hire and send the Hire Agreement to us. The Hire Agreements are usually returned by email, but occasionally the Hire Agreement is returned by post in which case they are scanned and the printed version shredded.

There are occasions on which we receive tentative **enquiries or have requests for bookings** when they become available. We collect this information via email. When a hirer first hires their name is written on a Key Receipt Form which the hirer signs.

Bank Details: When a person hires the Hall they are asked to pay a £30 refundable Key Deposit and in some circumstances are also asked to pay a refundable Security Deposit. When the hirer has finished their hire(s) and have returned their key and have fulfilled their obligations, refunds are paid by us to the Hirer by Bank Transfer. We ask the Hirer to give us their bank details by email, and within 24 hours have put those details on our bank (Cafbank). Once the refund has been paid and received by the Hirer—due to the need for dual authorisation there can be a delay of a few days—we immediately remove the hirer's bank details from our bank but retain the email in which the hirer gave us their bank details for a period of no more than 10 days just in case the hirer had not given their correct bank details to us and do not wish to take responsibility for their mistake.

CCTV: CCTV cameras are placed outside the Hall at strategic positions and are continuously monitoring the surroundings for security. The recordings are stored on a computer.

2. HOW THE DATA ARE STORED AND WHO HAS ACCESS TO THEM

As described above the Data we collect consists of names, addresses, phone numbers and emails, and for a very short time Bank Details. The data is stored in:

- (1) a strong password protected accounts package (Quickbooks)
- (2) emails, sometimes with invoices attached, in a very strongly protected email system.
- (3) the name of a hirer is entered in an Excel Key Register File and on a Key Receipt form they signed.
- (4) in pdf files of invoices and hire agreements in Dropbox which is strongly password protected

ALL FILES stored above are stored within protected Dropbox (paid) and are not available to any third party. The Hall Manager of The Cliffe Hall is the only person who has access to the data we collect and all the data above are also strongly protected via paid Eset and Roboform on The Hall Manager's desktop and mobile.

(5) CCTV videos are stored on a password protected computer (only known by The Hall Manager) and the only access given to third parties are to the Police if they have good reasons to make the request. Older videos are automatically deleted as new recordings are made. The computer itself is in a locked room and only the Cleaner, Caretaker and the Hall Manager have access to that room.

3. SHARING THE DATA

The only situation in which data might be shared by The Hall Manager would be during The Hall Manager's prolonged absence:

- Given that The Hall Manager may not always be available or a hirer may need attention in person at the Hall, the Manager emails all Hirers at the beginning of his absence to provide them the emails and phone numbers of The Cliffe Hall's Cleaner and Caretaker and Precinct Cleaner—both of whom have given their permission for the Manager to do so.
- If an issue crops up where the Hirer has not got the data of the three staff and needs attention at the Hall, with the Hirer's permission The Hall Manager will give the Hirer's name, phone number and email to The Cliffe Hall's Cleaner or Caretaker to ensure a response.
- If the Police request access to CCTV recordings and have adequate reason and right to do so.

With the exception(s) above, The Cliffe Hall ***will never pass any of the data held on to any third parties without the third party's express written permission. Nor is a request ever likely.***

4. PURPOSE FOR WHICH THE DATA ARE USED

The data are processed on the basis of legitimate interest for the good functioning of The Cliffe Hall and its Hirers.

5. DATA REMOVAL AND ARCHIVING

Bank details given by Hirers are speedily erased as explained above.

Given financial regulations, The Cliffe Hall keeps invoices and accounts for at least six years, and

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annual archive folders are created and password protected.

When Hirers have permanently ceased to use The Cliffe Hall for at least a year or aspiring hirers have not been able to hire within a year we:

- Permanently destroy Hire Agreements
- Permanently destroy emails
- Permanently destroy contact data

ADOPTED 05 MAY 2023

The Cliffe Hall Manager