

# Walford Village Hall – Data Protection Policy (Internal)

Last Updated: March 2026

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## 1. Purpose

To ensure trustees, volunteers, and staff handle personal data responsibly, protecting privacy and complying with UK GDPR and the Data Protection Act 2018. This policy also covers personal data captured via CCTV.

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## 2. Responsibility

- **Committee / Trustees** – overall responsibility for ensuring compliance with this policy.
  - **Volunteers / Staff** – must follow this policy in all areas of their work for the hall.
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## 3. Principles

All personal data will be handled according to the following principles:

- Collect only the **minimum necessary data** for a clear purpose.
  - Use personal data **only for the purpose it was collected**.
  - Store personal data **securely** (Google Drive, Jotform, Solar Accounts, encrypted banking).
  - Keep personal data **accurate and up-to-date**.
  - **Delete data securely** when no longer needed or upon request, unless legal or accounting obligations require longer retention.
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## 4. Data Handling

### Mailing Lists

- Subscriber data is maintained **only with explicit consent**.
- Clear opt-out instructions are provided in all communications.

### Bookings

- Booking data is retained for administrative purposes **up to 3 years**.
- Payment information is handled securely; banking details provided for deposit refunds are **deleted immediately after processing**.
- **Lawful basis:** Contract (performance of booking agreement).

### Volunteers

- Contact details are maintained **only while active**. Inactive contacts (12 months) are removed.
- Volunteer contact information is shared **only with consent**.
- **Lawful basis:** Legitimate interests (hall operations).

### Committee Members

- Committee contact details are shared **internally only**.

- Not to be shared outside the committee **without explicit consent**.
- **Lawful basis:** Legitimate interests.

#### **Ticket Sales / Event Orders**

- Retain personal data **only as needed** for the event.
- Provide privacy notice and deletion options.
- **Lawful basis:** Contract or consent.

#### **CCTV Footage**

- Footage is handled in accordance with the hall's CCTV Policy.
  - Stored securely; access restricted to authorised committee members.
  - Retained only as needed for security or investigation purposes.
  - **Lawful basis:** Legitimate interests (security).
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#### **5. Breaches**

Any **serious data breach** affecting individuals' personal rights or freedoms will be reported to the **ICO within 72 hours**, and affected individuals will be informed promptly. Lessons will be learned to prevent recurrence.

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#### **6. Review**

This policy will be **reviewed at least every 2 years** or whenever operational or regulatory changes occur.