1. **Introduction**
   1. Stutton Community Association is committed to protecting and respecting the privacy of personal data. Being transparent and providing accessible information to individuals about how we use personal data is a key element of the Data Protection Act 1998 (DPA) and the EU General Data Protection Regulation (GDPR).
   2. The purpose of this privacy notice is to help you understand what we do with any data you provide and how we process and protect it.
   3. Under the GDPR we do not have a statutory requirement to have a named Data Protection Officer. For Stutton Community Association, the Data Controller is the management committee. If you have any questions regarding your personal data please contact us (details at the end of the document.
2. **The Data We Collect and How We Use It**

The data we process falls into 5 main categories:

* 1. **Hall Bookings.**This is name, address, telephone number and email address as supplied by the prospective hirer. The data is collected via booking enquiries and the Hire Agreement. This information is used to ensure effective communication throughout the booking process, from initial request through to invoicing and banking of payment. The lawful basis for processing this data is that we are entering into a Contract with you for the hire of the facilities you wish to book.
  2. **Legal Agreements**
* **Business Users of the Car Park** This is the name and email address as collected through the legal agreement that allows businesses to use the car park for retail use. The lawful basis for processing this data is that we are entering into a Contract
* **Stutton Community Shop.** The data comprises the names of Trustees of both the charity and Stutton Community Shop CIC**.** There is a rental agreement and another relating the solar panels on the Community Hall roof and the supply of electricity to the shop. The lawful basis for processing this data is that we are entering into a Contract.
  1. **Stutton Community Draw**

This is the name and address as supplied by the individual buying an annual draw ticket. The data is used to ensure effective running of the monthly draws and communication to prize winners. The lawful basis for processing this data is that we are entering into a Contract with you for including you in the monthly prize draw.

* 1. **Email Distribution List.**

This comprises email addresses only. The distribution list is only used to notify recipients of events and information relating to events that the charity puts on. The email address is on our distribution list only if there has been explicit ‘opt in’. The lawful basis for processing this data is Consent.

* 1. **Trustee Data.**

This is name, address, telephone number, email address and date of birth. We are required by law to notify the Charity Commission of these details of the trustees. It is also necessary for there to be effective communication between trustees and committee members. The lawful basis for processing this data is therefore twofold. Firstly, there is the Legal Obligation of keeping details up to date with the Charity Commission. Secondly, there is Legitimate Need for effective communication between trustees and committee members.

* 1. **Supplier Data.**

This is name, address, telephone number and email address as provided by the supplier or as obtained from publicly available sources (e.g. internet, telephone book, etc.). The information is used to help communicate with appropriate suppliers for the purchase of goods or services. The lawful basis for processing this data is that we are preparing to enter into a Contract for the purchase of those goods and services.

* 1. **Covid**

As part of the government’s control of Covid infections there has been a requirement to the collect names and telephone contact numbers at events run by the charity. The information is collected in order to advise attendees in the event that a positive Covid infection has occurred. There is currently no requirement to collect this information.

1. **How We Store Your Personal Data**
   1. Paper based data (e.g. Trustee declaration forms, Community Draw stubs, signed Booking Agreement Forms, etc.) is held in files by the Trustee responsible for the processing of that particular data. The data is held in locked premises.
   2. Electronic based data is only stored and accessed using password protected computers/devices.
   3. The charity’s committee makes use of email to communicate with each other, with suppliers, with volunteers, with hirers, etc. Email requires the use of 3rd party email services and, as part of this, there is at least transient use of this 3rd party 'cloud' storage.
   4. The Google Drive account and all email accounts are password protected. Google and other email and cloud storage service providers themselves have very strict data protection policies and highly secure IT hardware and infrastructure.
2. **How Long We Retain Your Personal Data**
   1. Bookings data provides support to financial transaction so will be retained for 7 years in order to comply with financial audit requirements. After that point, it will be destroyed / deleted.
   2. The Community Draw data is held until the final monthly prize of the specified year has been paid. Two months after that point, the old community draw stubs will be destroyed / deleted.
   3. Email addresses in the email distribution list will be kept on the distribution list until the data subject requests that their email address be removed.
   4. Trustee data is a legitimate historical record of the Charity so will be retained indefinitely.
   5. Supplier data will be retained until the committee considers the supplier to no longer be considered for future provision of goods or services.
   6. Data collected to control Covid infections shall be destroyed 21 days after the event.
3. **Who We Share Your Personal Data With**
   1. We do not and will not sell any personal data.
   2. We will only disclose information to third parties or individuals when obliged to by law, for purposes of national security, taxation and criminal investigations, and the following situations:

* the name of each monthly draw winner is shared with the editor of Stutton Roundabout for publication in the next Stutton Roundabout magazine;
* trustee data is shared with the Charity Commission as this is a legal requirement;
* as stated in section 3 above, some documentation is held in 'cloud' storage. This is "sharing" in a purely technical sense as those services are delivered by 3rd parties and requires data to be held, at least temporarily, on their servers. The data is still private as this technical 'sharing' does not give permission for those providers (e.g. Google) to read/access the data held;
* where you have expressly given your consent for the information to be shared.

1. **Your Rights**  
   You have a number of very important rights.

These include rights

* to be informed about what data is collected and how it is used, stored, etc. This Privacy Statement plays a key role in explaining it.
* to ask us to remove your personal data from our records (unless it is necessary for us to continue to use the data for a lawful reason)
* to have inaccurate data rectified
* to request a copy of the information we hold about you.

There is more information about your rights at the Information Commission Office at this link:

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

|  |  |
| --- | --- |
| If you have any questions regarding your personal data please contact SCA | |
| By email -  By post - | wshewlett@gmail.com  Stutton Community Association, Stutton Community Hall, Manningtree Road, Stutton, Ipswich, IP9 2TA |