Privacy Policy

Your privacy is important to us, which is why we only collect the information we need from you to provide you with our services under a premises hire contract. We take great care to ensure the information we collect is kept confidential and handled responsibly and in accordance with legal requirements including data protection legislation.

Under the <u>data protection legislation</u>, including <u>General Data Protection</u> <u>Regulations (GDPR)</u>, we are required to explain to you why we collect information about you, how we intend to use the information you provide and whether we will share this with anyone else.

Who we are

We are Bolney Meadow Community Centre CIC, a dedicated venue provider in South London hosting special social events.

Our registered address is:

Bolney Meadow Community Centre CIC

31 Bolney Street

London

SW8 1EN

Where we refer to 'we', 'us' or 'our', this refers to Bolney Meadow Community CIC (BMCCCIC).

The information we collect

The sections below explain what information we collect.

Cookies

Bolney Meadow Community Centre CIC puts small text files, known as 'cookies', onto your computer to collect information about how you browse our site. Cookies are not used to identify you personally. By continuing to use our websites you accept the use of 'cookies'.

Read our **cookie policy** for information.

Personal data

This is information that can identify an individual - e.g. name, address, date of birth.

Sensitive data

This is personal information such as: racial or ethnic origin, political opinions, religious beliefs or other beliefs of a similar nature. Some of the information which we collect will be special categories of personal data (also called sensitive personal data), which includes information about your health and racial or ethnic origin.

How we collect information

We collect information in a variety of ways including but not limited to:

- when we enter into a short-term hire contract
- when you enter our building via CCTV
- When you call our offices
- · When you visit our website

When we ask you for information we will:

- Tell you why we need it and how it will be used
- · Collect only as much as we need to fulfil the hire contract between us
- Take steps to ensure it is accurate and up-to-date
- Make sure we don't keep it longer than is necessary
- Keep it secure and confidential so that it is only seen by those members of staff who need it to do their job

In return we ask you to:

- Give us accurate information
- Tell us as soon as possible of any changes in your circumstances

Why we collect this information

We use your personal data in various areas of work, including:

- Processing your deposit refunds
- Keeping you informed about your venue hire contract with us
- Legal proceedings
- To meet health and safety requirements of our staff
- Prevention and reduction of crime including fraud
- Equal opportunities monitoring

Research

We only ask for special categories of information where it is necessary for the service and we will ask your explicit consent to do so.

Where we are using your information because you have provided your consent to that use, you are entitled to withdraw your consent at any time. The lawfulness of our use of your information before consent was withdrawn is not affected.

Typically, we hold and process such data regarding managing your shortterm hire contract with us.

We are registered with the <u>Information Commissioner</u> as data controller. Our registration number is .

Image capture

Our landlord, Notting Hill Genesis uses CCTV cameras to manage the safety and security of staff and visitors to our building. Cameras are clearly marked with privacy notices explaining that cameras are in use. Further detail on how we manage cameras is available in Notting Hill Genesis' **CCTV policy**. Images may be captured via CCTV for the purposes of security.

We may also capture and process images during events organised and hosted by Bolney Meadow Community Centre CIC using film photography, digital photography, video or other medium and may be used on our website, in brochures or other publicity material (such as internal and external newsletters) and may be provided to the media for publication in local or national news publications. We will tell you when we are undertaking recording of this nature.

We undertake to inform all those whose images may be recorded (or their parents/guardians if under 18 years of age) of the purposes for which the images may be used by us. Bolney Meadow Community Centre CIC informs all persons taking part in our activities that they may be photographed, filmed, videoed or otherwise captured in image form. Where reasonable and practical to do so, Bolney Meadow Community Centre CIC seeks written consent to image capture. Where this is not possible for practical reasons, unless express objections are received, individuals attending a Bolney Meadow Community Centre CIC Genesis event are deemed to have given their consent by attending or remaining at the event. Any queries or complaints should be raised with the event host in the first instance.

Bolney Meadow Community Centre CIC acknowledges its responsibilities in capturing images by photography or other means under the provisions of the following legislation:

- The Protection of Children Act 1978 We recognise that it is a criminal offence to take, permit to be taken, distribute, have in one's possession or publish indecent photographs (including films and other imagery) of children.
- The Human Rights Act 1998 We recognise an individual's rights to privacy as protected by this Act.

Direct marketing

We would like to provide you with updates about events, services and other information that we believe may be of interest to you in relation to the services we offer. We may send you such information by post or telephone unless you have registered with the appropriate Preference Service or have asked us not to do so.

We do not provide your personal information to other companies for their marketing purposes.

If at any time you do not want your information used for direct marketing purposes, please contact us by **email**.

Email marketing

We would also like to provide you with some information above by email. However, we appreciate that email "spam" is a problem. If you have registered with us or have previously asked us for information on our services, unless it's explicitly for marketing we will ask if you are happy for us to contact you with information by email.

All the information we will provide to you will be sent by email and / or phone text messages.

You can change your preferences on receiving emails from us at any time by **emailing us**.

What do we do with the information we collect?

- It will be stored and used by us in accordance with this privacy statement and in accordance with your rights under the Data Protection Act 2018 and the General Data Protection Regulation
- It will be collected and used by us fairly and openly for delivering on our contract with you

- It will allow us to provide services which are tailored to your needs
- It will be used to improve the services you receive from us
- It will allow us to contact you in the most appropriate way.
- An understanding of your personal situation and individual needs will allow us to provide a tailored service that meets any physical, cultural or financial needs that you may have.

What is the legal basis for using your information?

In accordance with the data protection laws, we need a "legal basis" for collecting and using information about you. There are a variety of different legal basis for processing personal data which are set out in the data protection laws.

The lawful bases on which we rely to use the information which we collect about you for the purposes set out in this notice will be:

- You have provided consent to our use of your information;
- Using your information in this way is necessary for us to perform the contract between us and to take steps at the request of you prior to entering into the contract;
- Internal record keeping;
- Improving service delivery;
- Answering your queries;
- Contacting you for related research and surveys.

We may contact you by email, phone, or post, unless you have registered with the appropriate preference service or requested that we do not to do so.

Our legal requirements

We are committed to protecting your data. We will ensure your data is:#

- Fairly and lawfully processed
- Processed for limited purposes
- Adequate, relevant and not excessive
- Accurate
- Not kept longer than necessary
- Processed in line with your rights
- Safe and secure
- Not transferred to countries without sufficient protection

For more information please see:

ICO principles

Data Protection Act

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect.

Only relevant members of staff will access the information you provide to us.

Phishing

'Phishing' is the name given to attempts to steal personal details and financial account details from a website user. 'Phishers' use fake or 'spoof' emails to lead users to imitation websites where the user is tricked into entering their personal details, such as credit card numbers, usernames and passwords. Bolney Meadow Community Centre CIC will never send emails asking you for such details and our staff will never ask you for your password.

If you do receive such an email or are asked for your password by anyone claiming to represent Bolney Meadow Community Centre CIC, please forward the email or report the incident by **emailing us**.

Who we share this information with

Members of Bolney Meadow Community Centre CIC

Generally, only our staff has access to your personal information. However, in some cases we share it with our business partners, such as:

- Legal advisors
- Police and fire service
- Welfare advisors
- Medical professionals
- National Fraud Initiative credit agencies

We always make sure the organisations understand that the information must be used for the reasons we have specified and must be kept safe and secure. These organisations are also bound by contractual data sharing agreements.

We'll only share information about you which is relevant and necessary to address your individual needs.

In any other instances your personal information will not be shared with any other third parties, unless your explicit consent has been granted for example your MP to respond to a complaint.

Where we share information for these reasons we will tell you before the information is shared.

Regulators and other legal obligations

We may also be required to share your information with our regulators who are permitted access to this information by law for example to respond to a complaint that you have raised with them and with other organisations where we have a legal obligation to share the information with them.

International safeguards

The information you provide us with will never be disclosed outside of the European Economic Area, unless there are appropriate safeguards in place, including contracts and requiring any third party to adhere to these

Accuracy of your information

We endeavour to keep our records up to date. However, if any of your personal details change (e.g. telephone number, contact information), please let us know and we will ensure our systems are corrected.

Make a complaint

As with all our services, if you aren't happy with the way we have used your data you are entitled to <u>make a complaint</u>.

Our data protection officer

Our data protection officer is responsible for overseeing what we do with your information and monitoring our compliance with data protection laws.

If you have any concerns or questions about our use of your personal data, you can contact our data protection officer by writing to:

The Data Protection Officer, Bolney Meadow Community CIC

31 Bolney Street

London

SW8 1EN

You can also get in contact by **emailing us**.

You also have the right to complain to the <u>Information Commissioner's</u> <u>Office (ICO)</u>if you are not satisfied with the way we use your information.

Control of your personal information

The Data Protection Act and General Data Protection Regulations are in place to protect your privacy. You have many rights under the legislation, one of which is that you may ask to see the information we hold on you by filling out a 'Subject Access Request'.

You can <u>contact your officer</u> or write to the address below if you have a request or question:

Subject Access Request, Bolney Meadow Community CIC

31 Bolney Street

London

SW8 1EN

You can **email us** with the subject heading 'Subject Access Request'.

Can we use your information for any other purpose?

In limited circumstances we may use your information for a purpose other than those set out in this policy. If we intend to use it for another purpose, we will contact you before we do.

Deleting your information

We'll store the personal data which you provide to us for as long as you remain a service user. Once you stop using our service we'll review your information and determine whether there are any reasons why we need to keep it. For example, if a service user is in arrears when they leave the

property, it may be necessary to retain information about them to recover those arrears. Once the identified purpose comes to an end we'll delete your information.

Your rights

In relation to the information which we hold about you, you are entitled to:

- Ask us for access to the information
- Ask us to rectify the information where it is inaccurate or is incomplete
- Ask us to erase the information and take steps to ask others who we have shared your information with to also erase it
- Ask us to limit what we do with your information
- Object to our use of your information and ask us to stop that use
- Instruct us to provide you with the information we hold about you in a structured and commonly used format or transmit that information directly to another organisation (for example, if you want the information to be sent to another housing provider)

Our obligations to comply with the above rights are subject to certain exemptions.