

At Hagley Community Association, we take the safeguarding of your information very seriously. One of the ways we do this is by adhering to the requirements of UK data protection legislation, and this has changed as part of the General Data Protection Regulation (GDPR for short) in force from 2018.

Before we get started, here are a few things to keep in mind. When we talk about “you” or “your” we mean the person who is the registered User of the website of Hagley Community Association at <https://www.hagleyvillage.org>.

Where we talk about Hagley Community Association or HCA, we mean the charity whose registration number is 523146.

Hagley Community Association will be the Controller of the information that you provide to us, when you use our website.

This Privacy Policy gives you detailed information on when and why we collect your information, how we use it, and how we keep it secure. Please take a moment to read it so you know what choices and rights you have about the information we may ask you for, or collect about you. This policy may change from time to time so it's a good idea to come back and read through it every now and then. If there's a significant change to the policy, we'll let you know straight away.

What kind of information do you collect, when and how?

There is only one way we collect information about you and that is when you create your account and log into our website. We never keep more information from you than we need to.

Information you give to us:

When you hire the Community Centre we'll ask you to give us your generic details (i.e. first name, last name), your contact details (i.e. address, email, 'phone numbers), if you elect to have invoices sent to another address we will collect those generic details (name, address, email and 'phone number).

Other information we collect from you when you use our website:

When you visit this website, we may use cookies (which are stored on your device(s) your laptop, mobile phone, tablet etc.) to collect information about your use of our online Booking system. See our Cookies Policy for more details.

We do not collect or store payment or transaction data.

If you are an Affiliated User, we may collect information about your organisation, how to contact them, what they do and what events they plan.

Information collected from others:

Our internet providers store Device Data (IP address, device make and manufacturer, browser information and other similar identifying information required from your devices to communicate with websites and applications on the internet).

Where we've got a legitimate interest, which is where we've got a good reason to process your data; e.g. situations where Hagley Community Association needs to process information to operate the Community Centre. However, we always do this by considering the safeguards and impact to you.

Hagley Community Association is required to capture, retain and share some personal data for legal reasons such as:

- Where there's a need to block unauthorised or illegitimate content;
- Responding to courts and enforcement authorities;
- To help authorities with any security, crime or anti-terrorism enquiries;
- To demonstrate compliance with anti-money laundering rules;
- To ensure monitor any other regulatory requirements linked with treating customers fairly and processing records properly.

Why do you collect my information?

There are a few ways we use the information we hold about you. We'll use it:

- Where it's necessary to perform our contract with you
- To determine your eligibility to use the Community Centre;
- To process your orders for hiring The Community Centre and to invoice you for the same;
- To provide you with the Hire you have requested from us;
- To respond to any questions or complaints you may have regarding our website or The Community Centre or The Village News.

Where we process your information on the basis of your consent, you've got the right to withdraw your consent at any time. You can do this by:

Accessing the "My Details" page on your Hagley Community Association account, or by contacting us.

This won't affect the lawfulness of anything we've done with your information on the basis of consent prior to that point

Where we've got a legitimate interest, which is where we've got a good reason to process your data; e.g. situations where Hagley Community Association needs to process information to operate its business. However, we always do this by considering the safeguards and impact to you.

Processing activities based on a legitimate interest are:

- To provide you with information and updates in relation to your interaction with The Community Association;
- To enable us to gain customer insights and to review, develop and improve our interaction with you;
- Complying with laws and regulations that apply to us.

Who do you share my information with?

Sometimes we'll need to share the information we hold about you with others. We provide information about you:

- To our volunteers and employed agents so they can administer, and deal with any questions or complaints you've got about your account with us and/or the services provided to you by Hagley Community Association now or in the future;

- For the purposes of fraud prevention;

- We may share your information to comply with legal and regulatory obligations to protect or enforce our rights or that of a third party such as analysing activity on our network to help block unauthorised or illegal content access or publication; for the purpose of

protecting vital interests, national security, statutory obligations or responding to requests from courts and enforcement authorities;

If you use The Centre on a regular basis then we may pass your contact details to parties who may be interested in joining your event.

We don't share your personal data with other companies.

We won't pass on your personal information to third parties except in accordance with this policy and our Terms and Conditions or where we are required to disclose that information in order to comply with any legal or regulatory requirements.

How do you protect my information?

The security of your information is really important to us. Any information sent to us is protected using robust security methods. The methods we use are industry-standard ensuring data is safeguarded whilst being sent over unprotected communications paths such as the internet. When it reaches us, we store it securely and only provide access to it by those authorised. Although we safeguard your personal information once received, Hagley Community Association cannot guarantee the safety of any personal information you transmit to us using online methods.

Our security measures include:

Encryption of data where appropriate;

Regular penetration testing of systems;

Security controls which protect the Hagley Community Association website from external attack and unauthorised access;

We'll never ask you for your Hagley Community Association identification or on-line passwords directly associated with your Hagley Community Association account in any unsolicited phone calls or unsolicited emails. In accordance with our Terms and Conditions, you're responsible for keeping your password secure and we very strongly recommend you do not disclose them to anyone (unless you wish to authorise them to access your account and potentially incur charges on your account).

How do you keep my information?

We collect and store your data safely and only for the time strictly necessary to operate services provided to you by Hagley Community Association and/or based on the reasons that we process your personal data. Afterwards it'll either be destroyed or anonymised.

When determining the relevant time we store information, we take into account factors such as:

Legal obligation(s) requiring data to be kept for certain periods of time;

(Potential) disputes;

Guidelines issued by the UK's data protection authority.

A few examples for how long we'll keep your data:

Unless you ask us not to, we delete all of your details after three months unless you have used The Community Centre or advertised with us;

We keep your billing data for 7 years, for tax purposes.

What are my rights when it comes to my information?

Here we'll explain the rights you have regarding your information:

## Rights

What does this mean?

### 1. The right to be informed

You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. This is why we're providing you with the information in this Privacy Policy.

### 2. The right of access

You're welcome to ask us what information we have about you, any time you like.

You have the right to obtain access to your information (if we're processing it), and certain other information (similar to that provided in this Privacy Policy).

This is so you're aware and can check that we're using your information in accordance with data protection law.

We won't charge for this and we'll do our best to get details back within 30 days.

Check out the Contacting Us section if you want to find out how to get access to your information.

### 3. The right to rectification

You're entitled to have your information corrected if it's inaccurate or incomplete. Just let us know where to make the changes!

### 4. The right to erasure

This is also known as "the right to be forgotten" and, in simple terms, enables you to delete your account where there's no compelling reason for us to keep using it. This is not a general right to erasure; there are exceptions.

### 5. The right to restrict processing

You have rights to "block" or suppress further use of your information. When processing is restricted, we can still store your information, but may not use it further. We keep lists of people who have asked for further use of their information to be "blocked" to make sure the restriction is respected in future.

To exercise any of these rights at any time, check out the Contact Us section.

What do I need to know about cookies?

Unlike most website providers, we don't use cookies. You can find out everything you need to know about cookies on our dedicated page.

What happens when I click a link on your website that takes me to another site?

Occasionally our site may provide access to other web sites by linking to them. We're not responsible for the data policies (including data protection and cookies), content or security of these linked websites. So, it's a good idea to make sure you refer to their privacy policies to ensure you know how they use your data.

How can I get in touch with you?

For queries regarding Hagley Community Association's services, please call one of our volunteers, the details are on the Contact Us page.

If you've got any questions or concerns about our use of your personal information you can write to:

The Secretary  
Hagley Community Centre  
Worcester Road  
Hagley  
Stourbridge  
DY9 0LG

Send an email to [minits@hagley.uk](mailto:minits@hagley.uk)

If you're not satisfied with our response to your question or concern, or believe our processing of your information doesn't comply with data protection law, you can make a complaint to the Information Commissioner's Office (ICO) at <https://ico.org.uk/global/contact-us/>

Where you've got access to Hagley Community Association website but you're not the account holder then Hagley Community Association will need contact to be made and/or authorised via the account holder. We don't want to share information with anyone unless we know who they are and this can be difficult without proof; we're acting in your best interests.