PLATT MEMORIAL HALL

DATA PROTECTION & PRIVACY POLICY

1. Purpose

Platt Memorial Hall is committed to protecting the privacy and personal data of all individuals who interact with the Hall, including hirers, visitors, volunteers, trustees, contractors and supporters.

This policy explains how personal data is collected, stored, used, shared and disposed of in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and other applicable legislation.

2. Definitions

Personal Data means any information relating to an identified or identifiable individual. This includes names, addresses, telephone numbers, email addresses, financial information, photographs, CCTV images and other information that can identify a person.

Processing means any operation performed on personal data, including collection, storage, use, amendment, disclosure and deletion.

Data Controller means the organisation responsible for determining how and why personal data is processed. For the purposes of this policy, Platt Memorial Hall Trustees act as the Data Controller.

3. Responsibilities

Overall responsibility for data protection rests with the Trustees of Platt Memorial Hall.

Trustees, volunteers and anyone acting on behalf of the Hall must:

- Comply with this policy.
- Handle personal data securely and confidentially.
- Only access personal data required for their role.
- Report any suspected data breach immediately to the Trustees.

4. Data Protection Principles

Platt Memorial Hall will ensure that personal data is:

- Processed lawfully, fairly and transparently.
- Collected only for specified, explicit and legitimate purposes.
- Adequate, relevant and limited to what is necessary.
- Accurate and kept up to date where necessary.
- Retained only for as long as necessary.
- Kept secure against unauthorised access, loss or disclosure.
- Processed in a manner that demonstrates compliance with UK GDPR.

5. Personal Data We Collect

Platt Memorial Hall may collect and process the following information:

Contact Information

- Names
- Postal addresses
- Telephone numbers
- Email addresses

Booking Information

- Booking requests and history
- Hire agreements
- Correspondence relating to bookings

Financial Information

- Invoicing records
- Payment records
- Bank account details where required for refunds

Trustee, Volunteer and Contractor Information

- Contact details
- Role-related records
- Emergency contact details where appropriate

CCTV Images

- CCTV footage recorded around the Platt Memorial Hall perimeter for security and crime prevention purposes.

Accident and Incident Records

- Information recorded in accident books and incident reports where legally required.

6. Lawful Basis for Processing

Platt Memorial Hall processes personal data under one or more of the following lawful bases:

Contract

Where processing is necessary to fulfil a booking agreement or other contract.

Legitimate Interests

For the effective administration, operation, safety and security of the Hall.

Legal Obligation

Where records must be maintained to comply with legal, accounting, insurance, health and safety or regulatory requirements.

Consent

Where specific consent is required, such as for certain communications or photographs.

Vital Interests

Where processing is necessary to protect someone's life or wellbeing in an emergency.

7. How We Use Personal Data

Personal data may be used for:

- Managing hall bookings and hire agreements.
- Communicating booking confirmations and operational information.
- Processing invoices, deposits and refunds.
- Managing trustee, volunteer and contractor activities.
- Maintaining health and safety records.
- Investigating incidents, complaints or safeguarding concerns.
- Protecting the Hall, its users and its property.
- Complying with legal and regulatory obligations.

Personal data will not be used for unrelated purposes without an appropriate lawful basis.

8. Information Sharing

Platt Memorial Hall does not sell, rent or trade personal information.

Personal data may be shared:

- With service providers acting on behalf of the Hall (such as booking software providers).
- With insurers where necessary.

- With emergency services.
- With law enforcement agencies where legally required.
- Where disclosure is required by law or court order.

All third-party processors are expected to comply with UK GDPR requirements.

9. Data Security

Platt Memorial Hall takes reasonable technical and organisational measures to protect personal data, including:

- Password-protected electronic systems.
- Restricted access to records.
- Secure storage of paper records.
- Use of reputable third-party service providers.
- Secure destruction of records when no longer required.

10. Data Retention

Personal data will only be retained for as long as necessary.

Typical retention periods are:

Record Type	Retention Period
Booking and financial records	7 years
General enquiries not resulting in a booking	Up to 2 years
Accident and incident records	As required by legal and insurance obligations
CCTV footage	Up to 31 days unless required for investigation
Trustee and volunteer records	Whilst active and for an appropriate period thereafter

Records will be securely deleted or destroyed when no longer required.

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11. Individual Rights

Under UK GDPR individuals have the right to:

- Be informed about how their data is used.
- Request access to personal data held about them.
- Request correction of inaccurate data.
- Request deletion of personal data where legally applicable.
- Request restriction of processing.
- Object to certain processing activities.

- Request transfer of their personal data where applicable.

Requests should be made using the contact details below.

Platt Memorial Hall will normally respond within one calendar month.

12. Data Breaches

Any actual or suspected personal data breach must be reported immediately to the Trustees.

The Hall will:

- Investigate the breach promptly.
- Take steps to minimise harm.
- Recover or secure affected information where possible.
- Review procedures to prevent recurrence.

Where required by law, serious breaches will be reported to the Information Commissioner's Office (ICO) within 72 hours and affected individuals will be informed.

13. Complaints

Anyone concerned about the way their personal data has been handled should contact the Trustees in writing.

If a complaint cannot be resolved, individuals may contact the Information Commissioner's Office (ICO).

14. Contact Details

For questions, complaints or requests regarding personal data:

E-mail: jax.owens@btinternet.com

Postal Address:
Jackie Owens
C/O Platt Memorial Hall
Platinum Way
St Mary's Platt
Sevenoaks
Kent
TN15 8FH

Reviewed June 2026

Appendix A – CCTV Policy

Purpose

CCTV is operated for:

- Protecting visitors, hirers, volunteers and trustees.
- Protecting Hall property and assets.
- Preventing and detecting crime.
- Assisting law enforcement agencies where appropriate.

Camera Locations

Cameras are positioned around external entrances, exits, car parks and perimeter areas and in some internal areas.

No cameras are installed in toilets, changing facilities or other areas where privacy would reasonably be expected.

Signage

Clear signage is displayed informing visitors that CCTV is in operation.

Access to Footage

Access is restricted to authorised Trustees and designated individuals.

Footage will only be disclosed where legally required or for legitimate security purposes.

Retention

Footage is normally retained for a maximum of 31 days before automatic deletion unless required for an ongoing investigation.

Reviewed June 2026

Appendix B – Online Booking System and Cookies

Registration Information

Users of the online booking system may provide:

- Name
- Address
- Email address
- Telephone number
- Booking history
- Account login credentials

Passwords are encrypted by the booking platform and are not visible to Hall administrators.

Purpose

This information is used to:

- Manage bookings.
- Prevent scheduling conflicts.
- Generate invoices.
- Process deposits and refunds.
- Communicate booking information.

Third-Party Booking Software

Platt Memorial Hall uses a third-party booking platform acting as a Data Processor on behalf of the hall.

The provider may only process information in accordance with contractual instructions and applicable data protection legislation.

Cookies

The booking system uses essential cookies necessary for:

- Secure login.
- Session management.
- Completion of booking forms.

Disabling these cookies may affect the functionality of the booking system.

Reviewed June 2026