

**Arkenstall Village Centre**  
(Registered Charity No. 300394)  
**7 Station Road, Haddenham, Ely, Cambs CB6 3XD**

**Data Privacy Policy**

**1. Introduction**

This policy tells you what to expect when the Arkenstall Village Centre (AVC) collects personal information.

All data protection issues are currently dealt with by the Data Protection Officer (DPO) who can be contacted at [dataprotection@arkenstallcentre.org.uk](mailto:dataprotection@arkenstallcentre.org.uk)

The DPO is appointed by the AVC's Management Committee and has a seat on the Executive Committee.

All data held is treated as highly confidential and is never passed to anyone outside of those authorised to handle it within the AVC. Electronic data is held on a UK based Server.

**2. Data retained by the AVC**

We retain data in a number of categories:

Data retained	Retention period
Meeting minutes	permanently
Booking and invoicing information	a minimum of six years
Information on the bookings calendar on the AVC website	(linked to booking information)
General e-mails	two years after the end of the correspondence
Subject Access Request (SAR) log entries	two years after a satisfactory resolution of the request
Personal information relating to participants in the Haddenham Pantomime and other events which may involve children or vulnerable adults	six months
Covid-19 'Test and Trace' contact information (where held, but this is usually the responsibility of the hirer)	21 days
CCTV recordings	14 days
Contact details for volunteers	until the volunteer asks to be removed
Fund raising event mailing list	until the recipient asks to be removed

**a. Meeting minutes and other records**

These official records of the business of the AVC contain the names of (and sometimes other details relating to) Trustees and others involved with or in contact with the AVC. They will remain part of the archival record of the AVC.

**b. Booking and invoicing information**

The personal data recorded is the contact information necessary to complete the booking (name, address, telephone and email address of the hirer, and, where appropriate, the organisation they represent and the contact details of the person responsible for payments if that is not the hirer); we only use these details to provide the service which has been requested and for other closely related purposes. For example, we will use an individual's contact information to send them a booking hire agreement and to make their booking.

When a booking is made, this information has to be provided by the Hirer (or someone acting on their behalf) in order to complete the booking. Therefore processing of the personal data is necessary for the performance of the Hiring Agreement with the Arkenstall Village Centre. We consider the lawful grounds for processing this data under the Data Protection Regulations to be that the AVC is entering a Contract with the individual (in this case the Hirer).

- When a hirer makes their first booking their information is entered into the Bookings Database as a Customer record.
- When a booking is made an entry will be made in the Booking Database linking, time, date and other details to the appropriate Customer record.
- Other information associated with the Booking may include price confirmation or specific instructions.

Access to the Bookings Database is restricted to authorised members of the Management Committee who are permitted to book, amend or cancel for any Hirer.

Financial data relating to hirings is retained for at least six years from the end of the financial year in which the hiring took place in order to meet the requirements of the Inland Revenue. Once this period has expired, a hirer may request that their personal data be removed, although a name must continue to be associated with the hiring record in order to retain data integrity.

**c. Information on the bookings calendar on the AVC website**

The AVC website, [www.arkenstallcentre.org.uk](http://www.arkenstallcentre.org.uk), is primarily a source of download information for AVC users (containing Hiring Information, Fire Evacuation Procedures and so on). It also contains a calendar of room availability which displays bookings and is directly linked to the Bookings Database. The calendar can be used by anyone to view the availability of the facilities, but the only information displayed gives the room booked together with the date and time, and which organisation or individual has made the booking. Hirers can request that their booking is anonymised and marked as "private" on the displayed calendar.

**d. General e-mails**

We will monitor any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law. E-mails will be retained for two years after the apparent end of the correspondence in case the initiator wishes to re-open it.

**e. Subject Access Request (SAR) log entries**

When we receive a SAR we will record the name and contact details of the applicant, the name and (where appropriate) the contact details of the subject, the date of the application, the date of our response, the reason if we reject the application, the format of our response (eg CCTV images) if we accept the application, and the nature and dates of any follow up.

**f. Personal information relating to participants in the Haddenham Pantomime and other events which may involve children or vulnerable adults**

Contact information and other details for children and other young people who are involved in the annual fund-raising pantomime is only made available to those who need it to ensure clear communication channels following auditions and through the rehearsal period and run of the show. The information is retained for six months after the run in case of any necessary follow up, but is then deleted in accordance with the appropriate legislation.

A similar retention period is applied to information relating to all children and vulnerable adults involved in any activity organized by the AVC.

**g. Covid-19 'Test and Trace' contact information**

During the restrictions in put in place because of the Covid-19 pandemic, organisers of events are required to record the contact details of participants if they have not

registered their presence by scanning the AVC's QR code. This will be the case for any events organised by the AVC (although most events are arranged and managed by third parties). The legal requirement is that contact details should be retained for 21 days, until the risk of infection has passed.

**h. CCTV recordings**

Images recorded by the CCTV cameras in the AVC car park will be deleted after 14 days unless they are the subject of a request for retention by the police or an insurance company. More details relating to the CCTV installation and the management of its images can be found in the AVC's CCTV Policy document.

**i. Contact details for volunteers**

When a person registers their interest as a volunteer to help at an AVC fund-raising event or for any other purpose, their contact details are recorded and retained until they withdraw their offer of help.

**j. Fund raising event mailing list**

When people attend AVC fund-raising events they are asked if they would like to be added to the AVC's mailing list. If so, their contact details are recorded and will remain on the list until they ask for them to be removed. Subsequent e-mail notifications of events contain an 'unsubscribe' option.

**3. Complaints or queries in relation to a data protection issue**

The AVC tries to be as open as it can be in terms of giving people access to their personal information which it holds. Individuals can find out if we hold any personal information by making a **Subject Access Request (SAR)** under the Data Protection Act 1998.

If we do hold information about you we will:

- Give you a description of it,
- Tell you why we are holding it,
- Tell you who it could be disclosed to, and
- Let you have a copy of the information.

However, any recipient can email the DPO and request:

- Removal,
- Corrections,
- Restriction of use, or
- Raise an objection to the data being held or processed. In this case, confirmation of removal will be sent to the recipient requesting removal.

***For any queries relating to data held or processed by the Arkenstall Village Centre, please contact the Data Protection Officer by e-mail at***

**[dataprotection@arkenstallcentre.org.uk](mailto:dataprotection@arkenstallcentre.org.uk)**

**or by post to**

***The Data Protection Officer, Arkenstall Village Centre,  
7 Station Road, Haddenham, Ely, CB6 3XD.***