

Twyford Community Centre CIC Privacy Notice

This privacy notice tells you what to expect us to do with your personal information.

Contact details

Post:

Twyford Community Centre,
8, Queen Street, Twyford, WINCHESTER, Hampshire, SO21 1QG

Email: twyfordcommunitycentre@gmail.com

What information we collect, use, and why

We collect or use the following information to **provide good and services, including third party referrals:**

- Names, addresses and other contact details
- Photographs or video recordings
- Service use history
- Records of meetings and decisions
- Payment details (including card or bank information for transfers and direct debits)
- Information relating to compliments and complaints

We collect or use the following information to **receive donations or funding and organise fundraising activities:**

- Names, addresses and other contact details
- Payment or banking details
- Donation history
- Taxpayer information (for Gift Aid purposes)

We collect or use the following personal information **for the prevention, detection, investigation or prosecution of crimes:**

- Names, addresses and other contact information
- Customer or client accounts and records
- Video recordings of public areas (including indoor and outdoor spaces)
- Financial transaction information
- Witness statements and contact details
- Information relating to health and safety

We collect or use the following personal information for **service updates or marketing purposes**:

- Names, addresses and other contact details
- Marketing preferences
- Purchase (booking) history
- Donation history
- Records of consent, where appropriate

We collect or use the following personal information to **comply with legal requirements**:

- Names, addresses and other contact information
- Identification documents including National Insurance numbers
- Financial transaction information
- Health and safety information
- Food Registration numbers
- Public Liability Insurance Policy numbers
- Taxpayer status re Gift Aid claims

We collect or use the following personal information for **recruitment purposes**:

- Contact details (e.g. name, address, telephone number or personal email address)
- References

We collect or use the following personal information for **dealing with queries, complaints, or subject access requests**:

- Names, addresses and contact details
- Payment details
- Account information
- Purchase or service history
- Video recordings of public areas
- Witness statements and contact details
- Customer or client accounts and records
- Financial transaction information
- Information relating to health and safety (including incident investigation details and reports and accident book records)
- Correspondence

Lawful bases and data protection rights

Under UK data protection law, we must have a “lawful basis” for collecting and using your personal information.

- **Your right of access** - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for.
- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete.
- **Your right to erasure** - You have the right to ask us to delete your personal information.
- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information.
- **Your right to object to processing** - You have the right to object to the processing of your personal data.
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you.
- **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time.

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for collecting or using personal information

Our lawful bases for collecting or using personal information to **provide goods and services, including third party referrals** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - Twyford Community Centre is licenced to operate a bar that serves alcohol, but a requirement of its licence is that CCTV operates at the entrance of and within the Community Centre. The Management Committee considers the benefits of having a licence are greater than the impact on persons whose images are recorded, but please note the CCTV normally operates at all times (not only when the bar is in use); and images may be used for other legitimate purposes such as to resolve queries and complaints.
 - The Community Centre Management Committee has established email accounts for management and administration of the Centre and for communications to publicise its activities. Those email accounts may be accessed by several authorised account users. Shared operation of those email accounts is considered to benefit the functioning of the Community Centre and that this benefit normally outweighs the right to privacy. Where privacy is required a

password protected attachment may be used, but please note the email sender address will remain visible to all users of the account.

Oversight of such accounts also exists, to check messages to and on behalf of the Centre comply with legal obligations and for management and training purposes.

Emails issued from Community Centre accounts will include a link to the current Privacy Notice.

Our lawful bases for collecting or using personal information to **receive donations or funding and organise fundraising activities** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - The Management Committee will consider whether the benefit of collecting and using personal data to seek donations or funding and for organising fundraising activities to maintain the Community Centre without prior consent of the person potentially or subsequently contacted outweighs the impact on that person. Such personal data collected and used will only be selected on the basis that the person is reasonably considered unlikely to be adversely impacted.

Persons contacted will be provided with details of how they may decline any subsequent contact of that nature.

Our lawful bases for collecting or using personal information **for the prevention, detection, investigation or prosecution of crimes** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - The Management Committee considers the benefits to the effective operation and good reputation of the Community Centre of collecting and using personal data to prevent, detect, investigate or assist prosecution of crime without prior express consent of the person affected outweighs the impact on that person. In particular, because CCTV is normally in constant use, signage is in place to alert persons entering, egressing and within the Centre; and the camera outside the Centre is located so as to record only those persons within the curtilage of the Community Centre.

Our lawful bases for collecting or using personal information for **service updates or marketing purposes** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - The Management Committee will consider the respective benefits and harms of collecting or using personal data for service updates or marketing purposes. Personal data collected and used for these purposes may be because the person is an existing, previous or prospective user of the Community Centre and has not declined to receive emails about the Centre’s services. An example is that hirers or enquirers may be informed of matters of potential interest, such as changes to the availability, charges or facilities of the Centre.

Persons contacted will be provided with details of how they may decline any subsequent contact for update or marketing purposes.

Our lawful bases for collecting or using personal information to **comply with legal requirements** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may

apply, except the right to erasure, the right to object and the right to data portability.

- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:

- The Management Committee will consider whether the benefit (to the Community Centre which exists to benefit residents of Twyford and the neighbourhood) of collecting or using personal data subsequently needed for legal purposes outweighs the impact on that person. Such personal data will only be collected and used on the basis that the person is reasonably considered unlikely to be adversely impacted. An example might be that a potential donor is identified as potentially eligible and so asked to provide Gift Aid information with any subsequent donation.

Persons contacted will be provided with details of how they may decline any subsequent contact of that nature.

Our lawful bases for collecting or using personal information for **recruitment purposes** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - The Management Committee will consider whether the benefit of collecting or using personal data to contact a potential volunteer outweighs the impact on that person. Such personal data will only be collected and used on the basis that the person is reasonably considered unlikely to be adversely impacted.

Our lawful bases for collecting or using personal information for **dealing with queries, complaints or claims** are:

- **Consent** - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- **Contract** – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- **Legal obligation** – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- **Legitimate interests** – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - The Management Committee considers that the benefit to the Community Centre of collecting or using personal data to assist the Committee to deal effectively with queries, complaints or claims outweighs the impact on the person involved. Such personal data collected and used will only be selected on the basis that the person involved is reasonably considered unlikely to be unfairly adversely impacted. An example may be that a user of the Centre is identified and possibly subsequently contacted as a person likely to be able to assist the Management Committee resolve a query, complaint or claim received by the Committee.

Where we get personal information from

- Directly from you
- Family members or carers
- CCTV footage or other recordings
- Publicly available sources
- Suppliers and service providers

How long we keep information

1. Financial Records

We will hold personal data related to TCC's financial records (e.g. used for audit or Inland Revenue or Customs and Excise purposes, whether for remuneration or services used or supplied by TCC) for seven full financial years (and thereafter if such records are required for resolution of any formal ongoing matter requiring those records).

2. Constitutional Records

We will hold personal data (e.g. names) within Committee Minutes for at least seven full calendar years, but such personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, or historical research purposes.

3. CCTV Images

We will hold CCTV images for up to one month unless specific images are required to resolve any ongoing investigation or complaint. Deletion of retained images will be dependent on the nature of the investigation and the powers of any legal authority or other body with which images may be shared.

4. Marketing Communications

We will hold personal data for marketing purposes for as long as TCC continues to issue marketing communications and the individual recipients continue to consent to receipt of further such communications. Copies of emails relating to marketing communications sent on behalf of TCC will be deleted after 31st March in the following calendar year.

5. Other Public Communications

We will hold personal data in records of communications received by and sent on behalf of TCC for up to three calendar years, unless the communications are related to a purpose for which a longer retention period is applicable, as disclosed above. Examples of communications within this retention period are booking enquiries and responses other than a formal booking form which will be kept as a financial record.

6. Committee Members and other Volunteers

We will hold each volunteer's personal data for the duration of an individual's involvement as a volunteer and records of communications received by and sent from any volunteer in connection with their formal TCC activity, for up to three years after their cessation of involvement, (unless the data is related to a purpose for which a longer retention period is applicable, as disclosed above). Examples are emails between members of the Management Committee and certain volunteers about meetings and events at the TCC.

Who we share information with

Google, Meta (WhatsApp) and Microsoft

Google is the provider of email accounts controlled by the Twyford Community Centre; WhatsApp is used for marketing announcements to Twyford Social Flicks group members and also communications between volunteers; and Microsoft software and cloud storage is used for computer-based data files used for administration and management purposes.

Hampshire and Isle of Wight Constabulary

Twyford Community Centre is licenced to sell alcohol, a requirement of its licence is that CCTV operates at the entrance of and within the Community Centre. CCTV recordings may be requested by and submitted to the police authority or Winchester City Council as Licensing Authority, as part of their law enforcement and licencing activity.

Sharing information outside the UK

Where necessary, personal information may be transferred outside of the UK. When doing so, we aim to comply with the UK's General Data Protection Regulations, which requires that appropriate safeguards are in place. For further information, please contact us using the contact information provided above.

How the transfer complies with UK data protection law:

The Management Committee believes it is acting reasonably in placing its reliance on the good reputation and extensive resources of the major international organisations it uses to have in place effective arrangements for their provision of robust and compliant IT services to UK based individuals and organisations.

How to complain

If you have any concerns about our use of your personal data, you can make a complaint to Mr Tony Bronk the Management Committee volunteer who oversees our compliance with data protection and privacy and electronic communications regulations, using the contact details at the top of this privacy notice.

To ensure the privacy of your complaint, please write ADDRESSEE ONLY boldly on any envelope posted/hand delivered to the Community Centre and write FOA Tony Bronk, Twyford Community Centre, 8, Queen Street, Twyford, Winchester, Hants. SO21 1QG.

To submit a complaint by email please write "Tony Bronk Only" as the Subject of your email and put the details of the complaint in a password protected attachment to the email. Tony will reply giving you his direct contact details so that you may provide him with the password for the attachment. Please note that your email address will nonetheless be visible to all authorised users of the email account. To ensure absolute privacy please use the postal address in the first instance and submit details as to how Tony can contact you to deal with your complaint.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the UK's Information Commissioner's Office (ICO) at the following address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>

Last updated: 17 October 2024