

Love's Farm House

Privacy Policy

1. Purpose of this Privacy Policy

This is the Privacy Policy for Love's Farm Community Centre CIO (otherwise known as "Love's Farm House", "we" or "us"). Love's Farm House respects your privacy and is committed to protecting your personal data. This Privacy Policy will tell you how we collect and process your personal data and explain your privacy rights and how the law protects these rights via the Data Protection Act 2018 ("DPA") and UK General Data protection Regulation (UK GDPR).

2. Data Controller

Love's Farm Community Centre CIO, registered charity number 1157648, is the Data Controller and is responsible for your personal data. Our contact details are:

Address - Love's Farm House, 17 Kester Way, St Neots Cambridgeshire PE19 6SL

Telephone - 01480 262626

Email - bookings@lovesfarmhouse.co.uk

3. Data We Collect

"Personal data" means any information about an individual from which that person can be identified.

We may collect, use, store and transfer the following types of information about you:

- Identity and Contact data, including but not limited to your name, address, telephone number, email address and your image on CCTV footage;
- Financial data, including bank account and payment card details;
- Marketing and Communications data, including your preference to receive marketing material from us.

We **do not** collect any Special Categories of Personal Data about you (as defined in the UK GDPR).

4. How We Receive Your Personal Data

We collect your personal data through direct interactions with you and / or when you buy tickets for a Love's Farm House event via a third party ticketing platform. You may give us your data by filling in forms or by corresponding with us by post, telephone or email. For example, we may collect your identity and contact details through any hire form you submit to us when hiring a room at Love's Farm House, or when you complete the information on the booking page on our third-party online ticketing platform Tito. Other than the Tito ticketing platform, we do not receive your personal data from any third party source or automated technology.

We have CCTV cameras positioned in several locations within the building for security reasons. These cameras may capture photographic or video footage of you. Areas which are covered by CCTV cameras are marked with a white and yellow notice stating "Warning, CCTV in Operation."

The majority of the classes and events held at Love's Farm House are run by third parties, who hire rooms from us ("Hirers"). Love's Farm House does not collect, store or process any personal data on behalf of its Hirers. If you attend sessions which are run by a Hirer, the Hirer will be the data controller for any personal data you provide to them. It is a term of our contract with our Hirers that they must comply with data protection law, including the GDPR, in relation to their use of Love's Farm House. However we encourage you to read the Hirer's own privacy policy before you provide any personal information to them.

The Love's Farm House website or Facebook page may contain links to third-party websites, plug-ins and applications. Clicking on these links may allow third parties to collect or share data about you. We are not responsible for the use of your data by these third parties and would encourage you to read their privacy policies before providing any personal information to these third parties.

5. How and Why We Use Your Personal Data

We will only use your personal data in accordance with a lawful basis set out in the GDPR, most commonly where it is necessary for the performance of a contract with you, where it is necessary for our legitimate interests, or if it is necessary to comply with a legal obligation.

Your personal data will be used to enable us to provide our services to you and to meet our contractual commitments to you, for example for your hire of Love's Farm House or your attendance at an event run by Love's Farm House. Provided that we have your consent to do so, we may use your personal data to send you marketing information about future events and promotions. We will not use your personal information to send you details of third parties' products or services unless they are taking place at Love's Farm House. You may withdraw your consent to receiving marketing material at any time by emailing bookings@lovesfarmhouse.co.uk.

6. Disclosure of Your Information

We may have to provide your personal data to legal or regulatory bodies when we are required to do so by law.

We will never disclose your information to third parties to use for their own purposes, except where required by law. We may disclose your personal data to our own third party service providers in order to meet our contractual commitments to you, for example our booking system, invoicing system, ticketing system, website and Cloud storage hosts and our bank. We only use third party service providers which comply with the DPA and UK GDPR and who respect the security of your personal data.

7. Where We Store and Transfer Your Data

To help us provide our services to you, the personal data you provide to us may be transferred to, stored and processed in countries outside the UK. Our website and computer systems use remote servers, including for data stored in the "Cloud", and our booking, accounting and ticketing platforms are based outside the UK. All of our service providers have confirmed that they are committed to complying with the UK GDPR and ensuring the security of our customers' data.

8. Data Security

We have put in place appropriate security measures to prevent your personal data from being lost or being accessed by or disclosed to unauthorised persons. We have procedures in place to deal with any

suspected data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

When you send your personal data to us by email we cannot guarantee that the email process is secure. Once we receive your personal data we will ensure that it is stored and processed in accordance with our Privacy Policy, however when you use email to send the data to us this will be subject to the Privacy Policy of your email host.

9. Data Retention

We will only retain your personal data for as long as necessary to fulfil the purpose we collected it for, including satisfying any legal, accounting or reporting requirements. In particular:

- We will keep your Financial data (including payment card and bank details) only for as long as it takes to process the transaction for which you provided the data, and will destroy the data immediately after the transaction has been processed. Please note that if a financial transaction is completed by bank transfer our bank, Barclays Bank UK PLC, may process or store your Financial data in accordance with their Privacy Policy, which can be found at <https://www.barclays.co.uk/important-information/privacy-policy/>.
- We will keep CCTV footage for a maximum of **6 months**.
- We will keep the information you provide to Love's Farm House in relation to the purchase of tickets for an event for a period of **one year** after the event. Please note that if you purchase tickets for Love's Farm House events via the online ticketing platform Tito, Tito maybe the data controller and may process or store your personal data in accordance with their Privacy Policy, which can be found at <https://ti.to/privacy>.
- We will keep hire contracts for a period of **six years** after the date of hire.
- Provided you have given us your explicit consent, we will keep your Contact Data for the purpose of sending you marketing material for Love's Farm House until you withdraw your consent. You can withdraw your consent at any time by emailing bookings@lovesfarmhouse.co.uk.

10. Your Rights

Data protection law gives you certain rights over your personal data which is held by us. In some circumstances you have the right to:

- Request access to the information we hold about you. Please note that we may have to request information from you to confirm your identity and right to access the data, to ensure that your personal data is not disclosed to any unauthorised person.
- Request rectification of the personal data we hold about you.
- Request that we erase your personal data where there is no good reason for us to continue to process it. Please note that we may not always be able to comply with your request for specific legal reasons. If this is the case we will explain these reasons to you when we respond to your request.
- Object to our processing of your personal data when we are processing it on the basis of a legitimate interest and you feel it impacts on your fundamental rights and freedoms.
- Request restriction of processing of your personal data in particular circumstances: (a) if you want to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it, as

you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

- Request the transfer of your personal data to you or a third party.
- Withdraw your consent at any time, where we are relying on consent to process your personal data. Please note that this will not affect the lawfulness of any processing carried out before you withdraw your consent.

If you would like to exercise any of the rights above please email bookings@lovesfarmhouse.co.uk or write to The General Manager, Love's Farm House, 17 Kester Way, St Neots PE19 6SL. You will not normally have to pay a fee to access your personal data or exercise any of the other rights above. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We will respond to your request and, if relevant, provide the information we hold about you within **one month** of receiving your request.

11. Changes to This Policy

We may update this policy from time to time to reflect changes to our working practices or when required to by law. Historic versions can be obtained by contacting bookings@lovesfarmhouse.co.uk.

12. Complaints

You can make a complaint about this Privacy Policy using the Love's Farm House Complaints Policy, which can be found at <https://lovesfarmhouse.com/about/policies>.

You also have the right to make a complaint at any time to the Information Commissioner's Office, the UK supervisory authority for data protection issues. Details can be found at www.ico.org.uk.

Annex 1 - Procedure in the Event of a Personal Data Breach

Definition of a Personal Data Breach

The Information Commissioner's Office defines a personal data breach as *a security incident that has affected the confidentiality, integrity or availability of personal data. In short, there will be a personal data breach whenever any personal data is lost, destroyed, corrupted or disclosed; if someone accesses the data or passes it on without proper authorisation; or if the data is made unavailable, for example, when it has been encrypted by ransomware, or accidentally lost or destroyed.*

Procedure When a Personal Data Breach is Identified

1. Any Love's Farm House employees or volunteers who become aware of a data breach or suspected data breach must report it to the Operations Committee of the Trustees immediately.
2. The Operations Team shall arrange for measures to be taken to contain the breach as quickly as possible, for example deleting personal information that has been inadvertently posted online, or contacting email recipients and asking for the email to be deleted.
3. The Operations Team of the Trustees shall be responsible for investigating the data breach or suspected data breach and deciding whether it should be reported to the Information Commissioner's Office (ICO) and / or the Charity Commission, whether any remedial action needs to be taken to avoid a similar event in the future, and whether any disciplinary action should be taken against Love's Farm House staff in relation to the breach.
4. If the breach is likely to pose a risk to the rights and freedoms of individuals then **it must be reported to the ICO within 72 hours of becoming aware of the breach**, either via the ICO's helpline on 0303 123 1113 or via the Personal Data Breach Reporting Form on the ICO website.
5. If the breach constitutes a serious incident, it must also be reported to the Charity Commission promptly. A serious incident is *an adverse event, whether actual or alleged, which results in or risks significant:*
 - a. *Harm to your charity's beneficiaries, staff, volunteers or others who come into contact with your charity through its work...;*
 - b. *Loss of your charity's money or assets;*
 - c. *Damage to your charity's property;*
 - d. *Harm to your charity's work or reputation.*
6. If the breach is likely to pose a high risk to the rights and freedoms of individuals, the individuals concerned must be notified of the breach directly and without undue delay. For lower risk breaches the Operations Team of the Trustees will decide whether to notify the individuals concerned, taking into account the likelihood of any adverse consequences to that person resulting from the breach and whether they would be able to take steps to protect themselves from the effects of the breach if they were notified of it.
7. In all cases the Operations Team of the Trustees must investigate how the breach occurred and provide a report to the full Trustee Board of Love's Farm House setting out the circumstances of the breach and the remedial action that has been taken to ensure that no further incidents arise in the future.