

## Data Protection Policy

### Policy statement

At ETNA Community Centre we take your privacy seriously and are committed to protecting your personal information.

We will not share your contact details with any other organisation unless we have your permission, or under special circumstances, such as when we believe the law requires it.

ETNA Community Centre is committed to a policy of protecting the rights and privacy of individuals, voluntary and community group members, volunteers, staff, and others in accordance with The Data Protection Act 2018. The policy applies to all members and staff at the community Centre. Any breach of The Data Protection Act 2018 or The Community Centre Data Protection Policy is considered to be an offence, and, in that event, disciplinary procedures will apply.

As a matter of good practice, individuals working with the ETNA Centre, and who have access to personal information, will be expected to have read and comply with this policy. It is expected that our accountant and IT employee who deal with external organisations will take responsibility for ensuring that such organisations sign a contract agreeing to abide by this policy.

### Your rights

Any personal information submitted to ETNA Centre is treated in accordance with the Data Protection Act. To find out more about your entitlements under data protection legislation, visit the Information Commissioner's website [www.ico.org.uk](http://www.ico.org.uk)

### Collecting and Use of Data

The personal information we collect might include your name, address, email address, IP address, telephone number and information regarding what pages are accessed and when.

We may use your information to:

- process invoices for your bookings
- to carry out our obligations arising from any contracts entered by you and us
- seek your views or comments on the services we provide
- notify you of changes to our services
- send you communications which you have requested and that may be of interest
- to process donations where relevant

We do not send out random, untargeted emails, known as "spam".

We will generally only use your information for the purposes for which you have supplied it to us. If you have indicated that you are interested in receiving information about our activities via newsletters and/or event reminders, we may occasionally send you additional information that we feel may be of interest to you, such as details of new initiatives.

We will not share your contact details with any other organisation unless we have your permission, or under special circumstances, such as when we believe the law requires it.

## Updating or deleting your data/ Unsubscribing

You can ask us to update or delete any personal information that we hold and/or stop sending you any type of information at any time by emailing us at [info@etnacentre.org](mailto:info@etnacentre.org) or by writing to us 13 Rosslyn Road, Twickenham, TW1 2AR. In the case of newsletters and event reminders, you can update information or unsubscribe yourself by clicking on the relevant button at the bottom of any newsletter.

## Accuracy

The accuracy of your information is important to us. If you change email address or if any of the other information, we hold is inaccurate or out of date, please contact us or amend the records yourself.

Any information that we hold that is incorrect will be amended or deleted promptly.

## Access to your personal information

You have the right, to request details of personal information that we hold about you from us. You can make such a request by email using the contact information form on the website. We will take steps to confirm your identity before releasing any information to you. We will respond to your request within 10 working days unless there are exceptional circumstances.

## Security

We place great importance on the security of your personal information, and we always try to take appropriate precautions to protect it. All information that you provide to us is stored on secure servers operated by our third-party providers.

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for one of our suppliers. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, our third-party providers will use strict procedures and security features to try to prevent unauthorised access.

We are also concerned to protect your personal information off-line. We take steps to ensure that access to personal information is restricted to employees who need it. All ETNA Centre employees and volunteers who handle personal information are kept up to date on our security and privacy practices. Our employees are notified and reminded about the importance we place on privacy, and what they can do to ensure your information is protected.

We cannot, however, be responsible for the theft, destruction, or inadvertent disclosure of your personal information whether we hold it on or off-line.

## CCTV

ETNA has external CCTV cameras at the front and rear of the property, there are signs in place to make the public aware of this. The focus is on security of the property and equipment. Footage is held on file for 3 weeks; it is protected by username and secure password. If you require access to the footage, then please get in touch with the Centre Director.

Our nominated employee responsible for the storage of video, system procedures and reviews - Centre Director.

## Accountability

We will demonstrate accountability by documenting how personal data is handled and the steps taken to ensure only people who need to access some information are able to. We will also include training staff in data protection measures and regularly evaluate data handling processes.

## Email

We cannot guarantee the confidentiality of any messages transmitted between you and us via email as these are potentially accessible by the public. We will not be liable to you or anyone else for any loss in connection with any email message sent by you to us or by us to you.

## Cookies

Like many websites, ETNA Centre uses cookies in order to provide you with a more personalised web service. A cookie is a small piece of information sent by a web server to a web browser, which enables the server to collect information from the browser.

You may avoid the use of cookies by selecting the appropriate settings on your browser, however, please note that if you do this you may not be able to use the full functionality of this website.

You can find further information about cookies, including steps you can take to refuse their use, at the Interactive Advertising Bureau's website [www.allaboutcookies.org](http://www.allaboutcookies.org)

## Minors

The protection of children is very important to us. If you are under 18, please do not provide us with any personal information. Children should always ask a parent or guardian for permission before sending personal information to anyone on or offline.

## Policy Review

We will review this policy on an annual basis unless there is a legal requirement to do so before this date.

## Purpose of data held by the ETNA Community Centre

Data may be held by us for the following purposes:

- Staff Administration
- Fundraising & Information on other ETNA Events
- Accounts, Records & Booking System
- Newsletter database

## Data Protection Principles

In terms of the Data Protection Act 1998, we are the 'data controller', and as such determine the purpose for which, and the manner in which, any personal data are, or are to be, processed. We must ensure that we have:

### **1. Fairly and lawfully processed personal data**

ETNA Community Centre will always put our logo on all paperwork, stating their intentions on processing the data and state if, and to whom, we intend to give the personal data.

### **2. Processed for limited purpose**

We will not use data for a purpose other than those agreed by data subjects. If the data held by us are requested by external organisations for any reason, this will only be passed if data subjects (voluntary and community group members, staff, and others) agree. External organisations must state the purpose of processing, agree not to copy the data for further use and sign a contract agreeing to abide by The Data Protection Act 1998 and ETNA Community Centre Data Protection Policy.

### **3. Not kept longer than necessary**

We discourage the retention of data for longer than it is required. All personal data will be deleted or destroyed by us after registration has elapsed for two years on our newsletter database and seven years for accountancy/audit purposes.

### **4. Processed in accordance with the individual's rights**

All individuals that ETNA Community Centre hold data on have the right to:

- Be informed upon the request of all the information held about them within 40 days.
- Prevent the processing of their data for the purpose of direct marketing.
- The removal and correction of any inaccurate data about them.

### **5. Secure**

Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of data.

### **6. Accountability**

We shall be responsible for and be able to demonstrate compliance.

All computers have a log in system and our contact database is password protected, which allow only authorised staff to access personal data. Passwords on all computers are changed frequently. All partners/staff/users personal and financial data is kept in a locked filing cabinet and is only accessible by the ETNA Community Centre Staff.

**Date of policy: Sept 2022**  
**Review date: Sept 2023**