



# **Data Protection Policy**

### **Policy statement**

ETNA Community Centre takes privacy seriously and is committed to protecting your personal information.

We will not share your contact details with any other organisation unless we have consent, or where required by law.

ETNA complies with the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**. Any breach of this policy or the law is treated as a serious matter and may lead to disciplinary action.

This policy applies to all trustees, staff, volunteers, contractors and others working with or on behalf of ETNA.

# Your rights

Under data protection law, individuals have the right to:

- Access the personal data we hold about them.
- Request correction of inaccurate or incomplete data.
- Request deletion of data ("the right to be forgotten").
- Restrict or object to processing in certain circumstances.
- Request transfer of their data to another organisation (data portability).
- Withdraw consent at any time, where processing is based on consent.

Requests should be made by emailing **info@etnacentre.org**. We will take steps to confirm identity before releasing information and aim to respond within one month.

Further guidance is available from the Information Commissioner's Office (ICO): www.ico.org.uk

# **Collecting and Use of Data**

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

The personal information we collect may include:

- Name, email address, telephone number, IP address.
- Booking and payment information.
- Documentation to support bookings (e.g. safeguarding policies, DBS, insurance).
- Newsletter subscriptions.
- Fundraising details.

We may use this information to:

- Process bookings, invoices and donations.
- Meet contractual or legal obligations.
- Send requested communications, including newsletters and event reminders.
- · Seek feedback on our services.
- Notify you about changes to our services.

We do not send out spam or unrelated marketing communications.

# Updating or deleting your data/Unsubscribing

Individuals may request updates, corrections, or deletion of their data at any time by contacting us at <a href="mailto:info@etnacentre.org">info@etnacentre.org</a> or in writing to ETNA, 13 Rosslyn Road, Twickenham, TW1 2AR.

Unsubscribing from newsletters can be done directly using the link at the bottom of any email.

#### **DBS Checks**

Where activities involve children or vulnerable adults, we will either ask the hiring organisation to confirm relevant checks, or request sight of independent DBS certificates. In line with DBS guidance, ETNA does not retain copies — only reference numbers are recorded.

# Accuracy

We will ensure data is kept accurate and up to date. Inaccurate information will be amended or deleted promptly.

# **Security**

We take appropriate measures to keep data secure. This includes:

- Storing information on secure servers with third-party providers.
- Using two-step authentication where available.
- Training staff and volunteers in data protection.
- · Limiting access to personal data to those who need it.

Where data is stored or processed outside the UK, appropriate safeguards will be applied to ensure protection (e.g. standard contractual clauses).

### **CCTV**

ETNA operates external CCTV cameras at the front and rear of the building. Signs are displayed to inform the public. Footage is stored securely for three weeks and then deleted unless required for investigation.

The Centre Director is responsible for managing access and system reviews.

### **Accountability**

ETNA demonstrates accountability by:

- Documenting how personal data is collected, used, and stored.
- Training staff and volunteers in data protection.
- Regularly reviewing procedures to ensure compliance.

#### **Cookies & Online Activity**

Our website uses cookies to provide a better service. Users can disable cookies via their browser, though this may limit functionality.

Further guidance is available at www.allaboutcookies.org.

#### **Minors**

If you are under 18, please do not provide personal information without parental consent. Parents/guardians should supervise children's online activity.

#### **Retention of Data**

- Booking and registration data: normally deleted after 2 years.
- Financial records: retained for 7 years in line with audit requirements.
- CCTV footage: retained for 3 weeks.

# 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 info@etnacentre.org.

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.

# Purpose of data held by the ETNA Community Centre

Data may be held by us for the following purposes:

- Accounts & Booking System name/email address and telephone number
- Documentation to support your booking insurance, safeguarding policy etc.
- Newsletter database
- Fundraising

# **Data Protection Principles**

ETNA is the data controller under UK GDPR. We comply with the following principles:

- Lawfulness, fairness and transparency.
- Purpose limitation (used only for the stated purpose).
- Data minimisation (only what is necessary).
- Accuracy.
- Storage limitation (not kept longer than needed).
- Integrity and confidentiality (kept secure).
- Accountability (we are responsible and must demonstrate compliance).

### **Policy Review**

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

Date of policy: September 2025 Review date: September 2026