Ceddesfeld Hall home of the SCA

GENERAL DATA PROTECTION REGULATION (GDPR)

POLICIES & PROCEDURES

1. INTRODUCTION

The Sedgefield Arts & Community Association (SCA) exists to promote the benefit of the inhabitants of the area of benefit without distinction of sex, sexual orientation, age, disability, nationality, race or of political, religious or other opinions, by associating together the said inhabitants and the statutory authorities, voluntary and other organisations in a common effort to advance education and to provide facilities in the interests of social welfare for recreation and leisure-time occupation with the object of improving the conditions of life for the said inhabitants; To establish, or secure the establishment of, a Community Centre and to maintain and manage the same; And to promote such other charitable purposes as may from time to time be determined. The Charity shall be non-party in politics and non-sectarian in religion.

The SCA is a relatively small charity holding non-sensitive data on a limited number of people. This is a charitable organisation run totally by volunteers and at the time of writing this policy it does not have any employees. The management of the SCA is undertaken by a Board of volunteer Trustees. The Trustees of the SCA understand and accept their responsibility under the GDPR, to hold all personal data securely and use it only for legitimate purposes only, with the knowledge and approval of the data subjects.
In accordance with the following Policy and Procedure the Trustees undertake to uphold the principles and requirements of the GDPR in a manner which is proportionate to the nature of the personal data being held by the SCA.

2. DATA PROTECTION TERMINOLOGY

The terms used in this policy are the same as the defined terms detailed in the GDPR.

Data Subject - A data subject is an identifiable individual person about whom the SCA holds personal data. This may include a Trustee, Member, Employee, Contractor or potential Service User/Hirer
Contact Information - For the purposes of this Policy, "Contact Information" means any or all of the person's:

- full name (including any preferences about how they like to be called) **REQUIRED**
- full postal address **REQUIRED**
- telephone and/or mobile number(s) **OPTIONAL**
- e-mail address(es) **OPTIONAL**
- Membership category age group **REQUIRED**

Data Protection Officer - In the considered opinion of the Trustees the scope and nature of the personal data held by the Charity is not sufficient to warrant the appointment of a Data Protection Officer. Accordingly, no Data Protection Officer is appointed.
Data Controller – means the person who (either alone or jointly) determines the purposes for which and the way any personal data is to be processed. In the case of the SCA this is the Trustee Board Secretary.
Data Processor – The Board of Trustees will be responsible of for the processing of personal data. The SCA will not knowingly outsource its data processing to any third party (e.g.: Google G-Suite, Microsoft OneDrive) except as provided for in the section "Third Party Access to Data".

3. PRINCIPLES OF THE GDPR

The SCA will ensure that all personal data that it holds will be:

- processed lawfully, fairly and in a transparent manner
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes
- adequate, relevant and limited to what is necessary
- accurate and kept up to date
- kept in a form which permits identification of data subjects for no longer than is necessary
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage.

4. LAWFUL PROCESSEING

The SCA will obtain, hold and process all personal data in accordance with the GDPR for the following lawful purposes. In all cases the information collected, held and processed will include Contact Information (as defined in 2 above).

- **Consent** - Subject to the person's consent, this may include information selected and forwarded by the SCA on activities by other organisations which are relevant to those of the Charity. Note: this will not involve providing the person's personal data to another organisation. The information collected may additionally contain details of any areas of interest about which the person wishes to be kept informed. The information provided will be held and processed solely for the purpose of providing the information requested by the person
- **Contract** - People who sell goods and/or services to, and/or purchase goods and/or services from the SCA. The information collected may additionally contain details of the goods/services being sold to, or purchased from the Charity, bank and other details necessary and relevant to the making or receiving of payments for the goods/services being sold to, or purchased from the Charity. The information provided will be held and processed solely for the purpose of managing the contract between the SCA and the person for the supply or purchase of goods/services.
- **Legal Obligation** - Where there is a legal obligation on the Charity to collect, process and share information, with a third party – e.g.: the legal obligations to collect, process and share with HM Revenue & Customs payroll information on employees of the SCA. The information provided will be held, processed and shared with others solely for the purpose meeting the Charity's legal obligations.
  Certain member data is required to meet Charity Commission requirements – as indicated in section 2.
- **Vital Interest** - The SCA undertakes no activities which require the collection, holding and/or processing of personal information for reasons of vital interest.
- **Public Task** - The SCA undertakes no public tasks which require the collection, holding and/or processing of personal information.
- **Legitimate Interest** - Volunteers, Members and Trustees. In order to be able to operate efficiently, effectively and economically, it is in the legitimate interests of the SCA to hold such personal information on its volunteers, members and trustees as will enable the SCA to communicate with its volunteers, members and trustees on matters relating to the operation of the SCA, e.g.:
  - the holding of meetings
  - providing information about the SCA's activities – particularly those activities which, by their nature, are likely to be of particular interest to individual volunteers/members/trustees
  - seeking help, support and advice from volunteers/members/trustees, particularly where they have specific knowledge and experience
  - ensuring that any particular needs of the volunteer/member/trustee are appropriately and sensitively accommodated when organising meetings and other activities of the SCA

5. CLOSED CIRCUIT TV (CCTV)

The SCA is based in Ceddesfeld Hall, which is a Grade 2 listed building which is generally used by local groups/sections in addition to being available for private hire. Closed circuit television ("CCTV") is installed at Ceddesfeld Hall. Cameras are located at various places on the premises and images from the cameras are recorded digitally and then (unless an access request has been made) automatically erased by being recorded over after 10 days.

Appendix 1: details the purposes, objectives and procedures used to control the management, operation, use and confidentiality of the CCTV system.

6. INDIVIDUAL RIGHTS

- **The right to be informed** – when collecting information, the SCA will make available a Privacy Policy (statement) providing all relevant information
- **The right of access** - The data subject shall have the right to obtain confirmation as to whether personal data concerning him/her are being processed, and, where that is the case, access to his/her personal data. It will be explained to subjects who make a request to access their data or that while their requests will be actioned as soon as is practical there may be delays where the appropriate volunteers to deal with the request do not work on every normal weekday.
- **The right of rectification -** The data subject shall have the right to require the controller without undue delay to rectify any inaccurate or incomplete personal data concerning him/her. Data subjects will be clearly informed of their right to access their personal data and to request that any errors or omissions be corrected promptly. Such access shall be given, and the correction of errors or omissions shall be made free of charge provided that such requests are reasonable and not trivial or vexatious. There is no prescribed format for making such requests provided that the request is made in writing, signed & dated by the data subject (or their legal representative) and the data claimed to be in error or missing are clearly and unambiguously identified.
- **The right to erase (The right to be forgotten) -** Except where the data is held for purposes of legal obligation or public task the data subject shall have the right to require the SCA without undue delay to erase any personal data concerning him/her.

  Where a data subject requests that, their data be rectified or erased the Data Controller and Data Processor will ensure that the rectifications or erasure will be applied to all copies of the subject's personal data including those copies which are in the hands of a Third Party for authorised data processing.
- **The right to restrict processing -** Where there is a dispute between the data subject and the SCA about the accuracy, validity or legality of data held by the SCA, the data subject shall have the right to require the SCA to cease processing the data for a reasonable period of time to allow the dispute to be resolved
- **The right of data portability -** Where data is held for purposes of consent or contract the data subject shall have the right to require the SCA to provide him/her with a copy in a structured, commonly used and machine-readable format of the data which he/she has provided to the SCA, and have the right to transmit the data to another controller without hindrance.
- **The right to object -** The data subject shall have the right to object, on grounds relating to his or her situation, at any time to processing of personal data concerning him/her, which is based Public Task or Legitimate Interest, including profiling based on those provisions. The SCA shall no longer process the personal data unless they demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims. Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

7. PERSONNEL

The definitions of personnel roles are given in section 2.

Access to data - Except where necessary to pursue the legitimate purposes of the Charity, only the Data Processors shall have access to the personal data held by the SCA.

Training - The Board of Trustees and will periodically undergo appropriate training commensurate with the scale and nature of the personal data that the Charity holds and processes under the GDPR.

8. COLLECTING AND PROCESSING PERSONNEL DATA

The SCA collects a variety of personal data commensurate with the variety of purposes for which the data are required in the pursuit of its charitable objectives.

All personal data will be collected, held and processed in accordance with the relevant Data Privacy Policy/Statement, made available to data subjects as part of the process of collecting the data.

A Data Privacy Policy/Statement will be provided, or otherwise made accessible, to all persons on whom the SCA collects, holds and processes data covered by the GDPR. This will detail the nature of the data being collected, the purpose(s) for which the data is being collected and the subjects' rights in relation to the SCA's use of the data and other relevant information in compliance with the prevailing GDPR requirements.

9. INFORMATION TECHNOLOGY

Data protection by design/default

Inasmuch as:

- none of the SCA volunteer Trustees are data protection professionals
- it would be a disproportionate use of charitable funds to employ a data protection professional, given the scale and nature of the personal data held by the Charity
- the Trustees will seek appropriate professional advice commensurate with its data protection requirement whenever:
    - they are planning to make significant changes to the ways in which they process personal data
    - there is any national publicity about new risks (*e.g.:* cyber-attacks)
    - any material changes to the GDPR are proposed or have been made which might adversely compromise the Charity's legitimate processing of personal data covered by the GDPR.

Personal data will never be transmitted electronically (*e.g.:* by e-mail) unless carried out securely. The recommended approach is to encrypt the data in a Word or Excel file and send that object. The password should be sent by a separate channel, such as Text Message.

10. DATA PROCESSING EQUIPMENT

The scale and nature of the personal data held by the SCA is not sufficient to justify the SCA purchasing dedicated computers for the processing of personal data. All PCs used for SCA business should have patched operating systems, anti-virus/Malware protection and be locked using at the minimum a secure password/access key or biometric.

Whilst the data will be processed on the computers/laptops to which the Data Processors have access, no personal data covered by the UK-GDPR will be stored on those computers/laptops. All interim working data transferred to such computers/laptops for processing will be Held in the downloads folder (i.e. not a OneDrive/iCloud (or similar) folder) and securely deleted using an appropriate tool once processing has been completed.

Any removable or portable hard drives must be stored in a locked location or protected with a Kensington lock.

Obsolete or Dysfunctional Equipment - Equipment used to hold personal data, whether permanently or as interim working copies, which come to the end of their useful working life, or become dysfunctional, shall be disposed of in a manner which ensures that any residual personal data held on the equipment cannot be recovered by unauthorised persons.

11. DATA PROCESSING LOCATION

Data Processors shall only process the Charity's personal data in a secure location, and not in any public place, *e.g.:* locations where the data could be overlooked by others, or the removable data storage devices would be susceptible to loss or theft. Computers/laptops in use for data processing will not be left unattended at any time.

12. DATA BACKUPS

To protect against loss of data by accidental corruption of the data or malfunction of a removable data storage device (including by physical damage), all the Charity's personal data shall be backed up periodically and whenever any significant changes (additions, amendments, deletions) are made to the data.

Based on the function processing the data backup copies of the data shall be held in separate secure locations which are not susceptible to common risks (eg: fire, flood, theft), or using an online service as covered in 'Third Party Access to Data'

e.g.:

- Membership data is stored and backed up in line with suppliers GDPR compliance covered in 'Third Party Access to Data'

- CCTV – see Appendix 1

13. DATA RETENTION POLICY

Personal data shall not be retained for longer than: In the case of data held by subject consent; the period for which the subject consented to the Charity holding their data. In the case of data held by legitimate interest of the charity; the period for which that legitimate interest applies, and in the case of data held by legal obligation; the period for which the SCA is legally obliged to retain those data.
The SCA shall regularly – not less than every 6 months – review the personal data which it holds and remove any data where retention is no longer justified.
Appendix 2 – details the Data Retention procedures and Retention Schedules

14. Third Party Access to Data

Under no circumstance will the Charity share with, sell or otherwise make available to Third Parties any personal data except where it is necessary and unavoidable to do so in pursuit of its charitable objects as authorised by the Data Controller.
Whenever possible, data subjects will be informed in advance of the necessity to share their personal data with a Third Party in pursuit of the Charity's objects.
Before sharing personal data with a Third Party the Charity will take all reasonable steps to verify that the Third Party is, itself, compliant with the provisions of the UK-GDPR and confirmed in a written contract. The contract will specify that:

- The Charity is the owner of the data;
- The Third Party will hold and process all data shared with it exclusively as specified by the instructions of the Data Controller;
- The Third Party will not use the data for its own purposes;

- The Third Party will adopt prevailing industry standard best practice to ensure that the data are held securely and protected from theft, corruption or loss;
- The Third Party will be responsible for the consequences of any theft, breach, corruption or loss of the Charity's data (including any fines or other penalties imposed by the Information Commissioner's Office) unless such theft, breach, corruption or loss was a direct and unavoidable consequence of the Third Party complying with the data processing instructions of the Data Controller
- The Third Party will not share the data, or the results of any analysis or other processing of the data with any other party without the explicit written permission of the Data Controller;
- The Third Party will securely delete all data that it holds on behalf of the Charity once the purpose of processing the data has been accomplished.
- The Charity does not, and will not, transfer personal data out of the UK.

The following third party accesses exist at the SCA

- Membership data uses the Membermojo UK based membership system, it is stored and backed up in line with suppliers GDPR compliance covered in https://membermojo.co.uk/mm/help/gdpr, any downloads used in the process of managing the membership will be processed in accordance with section 10.

13. Data Breach

In the event of any data breach coming to the attention of the Data Controller the Trustees will immediately notify the Information Commission's Office.
In the event that full details of the nature and consequences of the data breach are not immediately accessible (eg: because Data Processors do not work on every normal weekday) the Trustees will bring that to the attention of the Information Commissioner's Office and undertake to forward the relevant information as soon as it becomes available.

Review

This policy will be reviewed at least annually by the SCA Trustee Committee or when new legislation requires this policy to be updated.

Useful contacts.

- Information Commissioners Office (ICO)
- Gov. UK

Signed on behalf of SCA.....Wendy R Gill.....

Date Adopted.....16/04/2026.....

Next review date.....30/4/2027.....

APPENDIX 1

CLOSED CIRCUIT TV (CCTV)

Ceddesfeld Hall is a Grade 2 listed building which is generally used by local groups/sections in addition to being available for private hire. The management of Ceddesfeld Hall is the responsibility of Sedgefield Arts, Recreation and Community Association (SCA). This is a charitable organisation run totally by volunteers and does not have any employees.

Closed circuit television ("CCTV") is installed at Ceddesfeld Hall. Cameras are located at various places on the premises and images from the cameras are recorded digitally and then automatically recorded over after 10 days. This appendix details the procedures used to control the management, operation, use and confidentiality of the CCTV system.

Purpose & Objectives

The purposes and objectives of the CCTV system are:

- to maintain the security of the premises
- to deter, detect and prevent crime, vandalism and anti-social behaviour
- to provide a safe and secure environment for visitors, members, volunteers, hirers and contractors
- to assist Law Enforcement Agencies to carry out their lawful duties.

Siting of the Cameras and Warning Signs

All cameras are clearly visible and located at strategic points around both the interior and exterior of the premises.

Cameras are positioned so that they only cover communal or public areas around the premises, and they have been sited so that they provide clear images. Appropriate signs are prominently displayed so that all visitors are aware they are entering an area covered by CCTV.

Storage and Retention of CCTV images

Recorded data is stored automatically for up to 10 days and stored on a hard drive which is secured within the SCA and to which only the SCA Facilities Manager or members of the SCA Trustee Committee have access. Recorded data will be stored in a way that ensures the security and integrity of the image and allows specific times and dates to be identified.

Normally, recorded data will not be retained for longer than 10 days. On occasion, images may need to be retained longer where, for example, an incident has been identified or a Subject Access Request has been made or time is required to enable the Law Enforcement Agencies to collect relevant images or the Law Enforcement Agencies are investigating a crime and ask for images to be preserved to afford them the opportunity to view the information as part of an active crime investigation. All retained images will be stored securely.

Access to CCTV Images and Disclosure

Access to recorded images is restricted to SCA Trustee Committee, all of whom are deemed by The Charity Commission to be legal Trustees of the SCA, including the Facilities Manager who is the recognised CCTV Data Controller, in accordance with the ICO guidance. Disclosure of information will be controlled and consistent with the purpose(s) for which the CCTV system has been established. Once information is disclosed to a Law Enforcement Agency, they will become data controller for the copy which they hold.

The following guidelines will be adhered to in relation to the disclosure of images:

- The disclosure of images will be in line with the above Objectives and will be controlled under the supervision of the Data Controller or his/her deputy

- A log will be maintained itemising the date, time(s), camera, person copying, person receiving and reason for the disclosure
- The appropriate disclosure documentation from the Law Enforcement Agencies will be filed for future reference
- Images must not be forwarded to the media for entertainment purposes or be placed on the internet
- Images must not be copied in any way, e.g. photographed, downloaded or printed for use other than described in the objectives
- The method of disclosing images should be secure to ensure that they are only seen by the intended recipient

Individuals' Access Rights

Under the Data Protection Act 1998, individuals have the right on request to receive a copy of the personal data that the Committee holds about them, including CCTV images if they are recognisable from the image. If anyone wishes to access any CCTV images relating to themselves, they must make a written request to the Committees' Chair within 10 days of the recording date, and the Committee reserves the right to charge a fee of £10.00 for the supply of the images requested. The request must include the date and approximate time when the images were recorded and the location of the CCTV camera, so that the images can be easily located, and identity can be established as the person in the images. The Committee will respond promptly and in any case within 20 calendar days of receiving the request. The Committee will always confirm the identity of the person making the request before processing it.

The CCTV Data Controller will first determine whether disclosure of requested images will reveal third party information, as no-one has a right to access CCTV images relating to other people. In such a case, the image of any third parties may need to be obscured if it would otherwise involve an unfair intrusion into their privacy.

If the Committee is unable to comply with an individual's request because access could prejudice the prevention or detection of crime or the apprehension or prosecution of offenders, the individual will be advised accordingly.

Complaints

Enquiries or complaints about the operation of SCA's CCTV system should be directed to the SCA Chairperson in the first instance at membership@sedgefieldsca.org.uk

APPENDIX 2
Retention of Documents and Records

Introduction
Sedgefield Community Association (SCA) recognise that the efficient management of its records is necessary to comply with its legal and regulatory obligations and to contribute to the effective overall management of the Charity. This policy framework will cover:
• Scope
• Responsibilities
• Relationship with existing polices
• Retention schedule

Scope
This Policy applies to all records created, received or maintained by Sedgefield Community Association while carrying out its functions. Documents are defined as all those documents which facilitate the business carried out by Sedgefield Community Association and which are thereafter retained (for a set period) to provide evidence of its transactions or activities.
These records may take different forms:
• Letters received from third parties
• Copy letters sent out by the Association
• File attendance notes
• Minutes
• Invoices
• Financial records
• Registers
• Membership forms/details
• Contracts/deeds
• E-mail communication
• Photographs
• Section records
• Health and Safety records
• Accident Book
Sedgefield Community Association may need to retain specific documents to fulfil statutory, Charity Commission, evidence events/agreements in case of dispute, meet operational needs, and preservation of documents of historic or other value. The untimely destruction of documents may cause Sedgefield Community Association difficulty in defining litigious claims, operational problems,
embarrassment, failure to supply information to Charity Commission.

Responsibilities
Sedgefield Community Association have a responsibility to maintain its records and record management systems in accordance with the regulatory environment. The designated officer with overall responsibility for this policy is Mrs. P. Buckley-Atkins Board Secretary. The Board Secretary will ensure conformity with the policy and Chairty Commission Guidance. They will ensure that records are accurate, maintained and disposed of within these guidelines and a record maintained
of all documents destroyed.

Retention Schedule
The Retention Schedule lays down the length of time which the record needs to be retained and the action which should be taken when it is of no further administrative use. The Retention Schedule refers to record series regardless of the media in which they are stored. The Board Secretary Mrs. P. Buckley-Atkins is the owner of the Retention Schedule and responsible for all aspects of retention and destruction in accordance with the schedule.

Retention Schedule

Document	Minimum Retention	Reason
Minutes	Indefinite	Legal Requirement
Agendas	Indefinite	Support Minutes
Correspondence (Major)	Indefinite	For Reference
Reports/papers	Indefinite	For Reference
Notes from meeting	Shred after typing	Not a Legal Document
Routine correspondence	10 Years	For Reference
E-Mails	Where required to keep, otherwise destroy each week	For Reference
Invoices	Indefinite	Audit/CC
Employee	2 years after employee leaves	Recommended by CC
Receipt/Payments	5 Years	For Reference
Annual Returns	Indefinite	legal requirement/CC
Bank papers	10 Years	Recommended by CC
Contracts	10 Years	In case of a claim
Audit budgetary control	10 Years	Audit
Quotations/tenders	5 Years	For Reference
Trustee details	5 Years	For CC
Insurance cert/policies	Indefinite	In case of a claim
Insurance claim documents	Indefinite	In case of a claim
Title/deeds/lease	Indefinite	legal requirement
Register of interest	Destroy after Trustee stands down	Current Information
Complaints	5 Years	In case of a claim
Disciplinary documents	5 Years	In case of a claim
Membership	10 Years	legal requirement/CC

APPENDIX 3
SPECIFIC DATA HANDLING PROCESSES

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Secretary

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Note: Post-Brexit, throughout this document, references to the General Data Protection Regulation (GDPR) are references to the original EU UK-GDPR incorporating the amendments set out in the Keeling Schedule.
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/969514/20201102_-_GDPR_-__MASTER__Keeling_Schedule__with_changes_highlighted__V4.pdf

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That license allows SCA to remix, adapt, and build upon this material non-commercially, as long as SCA credit Small Charity Support and license your any creations under the identical terms.

The privacy notice was created with the ICO website tool.

Appendix 4 Sedgefield Arts, Recreation and Community Association CIO customer privacy notice

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

- Contact details
- What information we collect, use, and why
- Lawful bases and data protection rights
- Where we get personal information from
- How long we keep information
- Who we share information with
- How to complain

Contact details

Telephone 01740 768181

Email membership@sedgefieldsca.org.uk

What information we collect, use, and why

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

- Names and contact details
- Addresses

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

- Name
- Contact information
- Any other personal information required to comply with legal obligations

Lawful bases and data protection rights

Under UK data protection law, we must have a "lawful basis" for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO's website.

Which lawful basis we rely on may affect your data protection rights which are set out in brief below. You can find out more about your data protection rights and the exemptions which may apply on the ICO's website:

- **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. Read more about the right of access.
- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. Read more about the right to rectification.

- **Your right to erasure** - You have the right to ask us to delete your personal information. Read more about the right to erasure.
- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information. Read more about the right to restriction of processing.
- **Your right to object to processing** - You have the right to object to the processing of your personal data. Read more about the right to object to processing.
- **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. Read more about the right to data portability.
- **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time. Read more about the right to withdraw consent.

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 the collection and use of your data

Our lawful bases for collecting or using personal information to **provide services and goods, including delivery and 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.
- 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:

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

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.
- 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:

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Where we get personal information from

- Directly from you
- CCTV footage or other recordings

How long we keep information

For information on how long we keep personal information, see our retention schedule at https:\/\/www.sedgefieldsca.org.uk\/policies\/2025\/sca%20gdpr%20policy.pdf

Who we share information with

Data processors

Membermojo

This data processor does the following activities for us: Online membership records system

Others we share personal information with

- Relevant regulatory authorities

How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's 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

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