



# DATA PROTECTION POLICY

## 1 Policy Statement

- 1.1 Waterlooville Area Community Association Charitable Incorporated Organisation (within this document "WACA") is committed to protecting personal data and respecting the privacy of our members, volunteers, staff, donors, and visitors. This policy explains how we collect, use, store, and protect personal data in line with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.
- 1.2 This policy applies to all data related to our activities at the premises we manage.

## 2 What Personal Data We Collect

We may collect the following types of personal data:

- Names, addresses, email addresses, phone numbers
- Emergency contact details
- Volunteer or staff records
- Attendance registers
- Donation and Gift Aid information
- CCTV images
- Any other information required to run our services safely and effectively

We only collect data that is necessary.

## 3 How We Use Personal Data

We use personal data to:

- Manage bookings and activities
- Communicate with hirers, users, staff, volunteers, suppliers and other parties
- Safeguard children and vulnerable adults
- Manage staff and volunteers
- Process donations and Gift Aid
- Comply with legal and regulatory requirements

## 4 Lawful Bases for Processing

We process personal data under one or more of the following lawful bases:

- Consent
- Contract
- Legal obligation
- Legitimate interests
- Vital interests (e.g. emergencies)

## 5 Special Category Data

Where we collect sensitive information (such as health or safeguarding information), we:

- Only collect what is necessary
- Store it securely
- Limit access
- Use it only for specific, lawful purposes

## **6 How We Store and Protect Data**

We keep personal data:

- In locked cabinets or secure digital systems
- Password-protected where stored electronically
- Accessible only to authorised staff or volunteers

We take reasonable steps to prevent loss, misuse, unauthorised access, or disclosure.

## **7 How Long We Keep Data**

We only keep personal data for as long as necessary.

Our retention schedule is provided at Annex 2.

## **8 Sharing Personal Data**

We do not sell personal data. We may share data:

- Where legally required
- With service providers who support our operations (e.g. payroll, IT)
- For safeguarding purposes

All third parties are required to keep data secure.

## **9 Individual Rights**

Under UK GDPR, individuals have the right to:

- Access their personal data
- Correct inaccurate data
- Request deletion (where applicable)
- Restrict or object to processing
- Data portability
- Withdraw consent

Requests should be made in writing to the Data Protection Lead: the Centre Manager (of Waterlooville Community Centre).

## **10 Data Breaches**

Any data breaches or suspected breaches must be reported immediately to the Data Protection Lead. We will assess and report serious breaches to the Information Commissioner's Office (ICO) within 72 hours where required.

## **11 Closed Circuit Television (Applicable to Waterlooville Community Centre only)**

Closed-circuit television (commonly referred to as "CCTV") is used:

- Clear signage is displayed
- Footage is used for safety and security only
- Recordings are kept for no longer than necessary

## 12 Data Protection Impact Assessment

Where processing is likely to result in a high risk to individuals' rights and freedoms, the Charity will carry out a Data Protection Impact Assessment (DPIA). This includes, but is not limited to, the operation of CCTV systems. The Charity maintains a DPIA covering CCTV operations, which is reviewed periodically.

## 13 Children and Vulnerable Adults

We take extra care when handling data relating to children and vulnerable adults and follow safeguarding best practice at all times.

## 14 Complaints

14.1 If you are unhappy with how we handle your data, please contact us first. Any complaint received will be dealt with consistent with our Complaints Policy.

14.2 You also have the right to complain to:

The Information Commissioner's Office (ICO) who can be contacted at [www.ico.org.uk](http://www.ico.org.uk).

## 15 Data Protection Roles & Responsibilities

The Roles and Responsibilities under this policy are summarised at Annex 3.

## 16 Revision History of Policy Subject

The revision history of this Policy subject is recorded at Annex 1.

## 17 Review of Policy

This Policy will be reviewed every year or whenever there are changes to relevant legislation.

## 18 Authorisation and Effectivity

This Policy is effective as of the date authorised below.

<b>Name:</b>	<i>Approved by the Board of Trustees</i>	<b>Signed:</b>	
<b>Date:</b>	18 February 2026	<b>Subject to Further Review:</b>	18 February 2027

**The annexes of the policy have been removed from this version of the document being uploaded to the WACA website.**