**Barmoor 1982 TRUST**

**Personal Data and Privacy Policy**

**Summary**

*This document explains how we handle data that we possess about individuals, in accordance with the Europe-wide General Data Protection Regulation (GDPR). It outlines the data we hold and how we use it. It explains how individuals may view the data we hold, should they wish, and how they may choose that it be deleted.*

**Introduction**

The Barmoor Trust (Barmoor) is an organisation that has been providing self-catering accommodation for educational, religious and health-related groups and to those providing support for socially disadvantaged groups since 1947, and as a registered charity since 1982. Each year the building is used by in the region of 30 different groups.

**Personal Data and Privacy**

Personal data is any information relating to a living individual that may be directly or indirectly identifiable as applying to them.

To fulfil its function, Barmoor processes personal data which relates to our users, as well as non-users who have shown interest, our trustees and other business contacts.

Barmoor is committed to maintaining the appropriate confidentiality, integrity and security of the personal data that we process, by complying with both our legal and ethical obligations in respect of data protection and privacy.

This policy sets out the principles Barmoor applies when processing personal data, and outlines the operational aspects of our various data processing activities.

**What Personal Data do we Collect?**

We collect the following information that has been given us by individuals:

**BARMOOR USERS**

To enable Barmoor to serve and communicate with its users, Barmoor maintains a Users Database comprising the following information which may contain or imply personal data:

**Personal/contact information:** names, contact and address details including landline and mobile phone numbers and email addresses

**Information about the purpose of booking**: nature of group and activity, any charge made to participants and any fee charged by group leader(s). This is so that we can ascertain which charging band applies.

**Personal social or health related information** that you may have given us to facilitate your booking process

**Payment information:** bank details

The Users Database will include personal data of those individuals who serve as Trustees for the Charity Commission.

**BARMOOR Non-USERS**

In some cases, individuals or groups who have chosen not to make bookings have given contact details as above in order to receive information and notice of Barmoor availability.

**Other contacts**

In addition to the Users Database, Barmoor also maintains a separate database comprising information (including name, address, contact details and banking details) provided by individuals from organisations such as suppliers and tradespeople, and other contacts whose details facilitate current or future possible activity.

**Website visitors**

When any user visits our website, we automatically collect certain limited information using cookies, as set up by our web platform. By this we can distinguish that user from other users and helps us to provide a better experience when they browse our website. It also allows us to improve our site.

There are two types of cookies:

Session (Transient) cookies: These cookies are erased when you close your browser, and do not collect information from your computer. They typically store information in the form of a session identification that does not personally identify the user.

Persistent (Permanent or Stored) cookies: These cookies are stored on your hard drive until they expire based on a set expiration date, or until we delete them. These cookies are used to collect identifying information about the user, such as Web surfing behaviour or user preferences for a specific site.

The cookies used on our site are listed in the appendix.

**ALL DATA SUBJECTS**

**Correspondence:** Barmoor will hold information relevant toanyspecific enquiries or business.

**Other:** Barmoor may keep any other information individuals may choose to provide to us and ask us to keep.

**RETENTION OF DATA**

Barmoor will retain data in order to continue notification to individuals or groups about future seasons’ bookings, until notified by that person to remove the data or until five years have elapsed with no contact, at which point all that person’s data will be deleted. Individuals or groups will be invited to give permission for ongoing use of their data when a new booking is made. In the event that Barmoor ceases to function, all data will be removed after an appropriate administrative interval.

**What do we do with your Personal Data?**

Barmoor **Users**

Barmoor will use the contact details supplied by users to provide them with information on availability and bookings.

Contact details may also used to provide news and information about Barmoor

Users banking details are used to confirm any monies paid or make any payments due.

Barmoor **non-Users**

Barmoor will use the contact details supplied by enquirers to provide them with information about Barmoor and its availability.

Contact details may also be used to provide news and information about Barmoor.

**Other Contacts**

We use the contact details of individuals from related organisations, and other contacts in the ordinary course of conducting our charitable function in accordance with applicable law and regulations.

**ALL CONTACTS**

From time to time, we may contact users, non-users and other contacts to invite them to specific events relating to our function. We take care to only invite individuals to events that are relevant to, and likely to be of interest to those individuals.

If you wish to be removed from our database, please write to our Data Controller .

**What is the Legal Basis for BARMOOR Data Processing?**

By law, Barmoor may only process personal data where it has a legal justification or requirement to do so.

Barmoor processes personal data as described above because it is necessary for the performance of our contracts with our users and Barmoor would not be able to fulfil its function without processing personal data as described in this policy.

**Your Rights in Relation to Personal Data**

Barmoor is committed to fair and transparent processing and any individual requiring information as to where Barmoor originated his/her personal data (including any public sources) may contact Barmoor at any time.

Individuals whose personal data we process have certain rights in respect of that data, including:

**Right to information and access**

You have the right to request access to the information that we hold about you.

On request, Barmoor will provide members with copies of their personal data in a convenient format (via electronic means or otherwise). Where technically feasible, Barmoor will also meet any member’s request to transfer their data to a third party.

**Rectification, erasure, and restriction**

You have the right to ask us to limit or cease processing or erase information we hold about you in certain circumstances. In responding to such requests, Barmoor will communicate to the individual concerned the impact of such restrictions or deletions, for example, on Barmoor’s ability to respond to future correspondence.

Barmoor takes reasonable steps to ensure that the personal data it holds about you is accurate and up-to-date and we will comply with any requests to rectify any inaccurate data we may hold about you.

Barmoor relies on the accuracy of information provided by its users and will rectify any notified inaccuracies following a request by the individual concerned. Requests for access to information regarding personal information should be made in writing to our Data Controller.

**Right to object**

You have the right to object to Barmoor using your information on the basis of its legitimate interests and the right to ask us not to process your personal data for marketing purposes, where relevant (see “What do we do with your personal data?” section above).

Barmoor is committed to respecting individuals’ rights. You may exercise your rights by contacting us using the details provided above and we will comply with your requests unless we have a lawful reason not to do so. Barmoor will endeavour to handle any requests within a reasonable period and, in any event, within a month of the original request.

We will not charge you for any of these activities.

**Might BARMOOR Share your Personal Data?**

Barmoor will only share personal data with third parties in the following circumstances:

**Service Providers and Suppliers**

Barmoor may employ external consultants to provide support and development services in relation to Barmoor services, systems and databases. These consultants may from time to time need to access information which may contain personal data for the purposes of systems testing and development.

**Financial Reporting**

The Barmoor auditors may also be given access to Barmoor systems for the purpose of the audit only.

**General**

In some circumstance, Barmoor may need to share your personal data where necessary with other third parties (including legal or other advisors, regulatory authorities, courts and government agencies) to enable us to enforce our legal rights, or to protect the rights, property or safety of our contractors or employees or where such disclosure may be permitted or required by law. Otherwise we will not share our data with any other organisation without your consent.

We require third parties to maintain appropriate security to protect information from unauthorised access or processing.

**Data Security**

Barmoor will take appropriate technical and organisational measures to protect the personal data we store, transmit or otherwise process against accidental or unlawful destruction, loss, alteration or unauthorized disclosure or access.

Any Data files shared by Barmoor with third parties are password protected. All data transfer through our website is encrypted as https under the control of our website platform.If you have reason to believe that your interaction with us is not secure, please notify us of the problem immediately by contacting us using the details below.

**How Long Does BARMOOR Retain Personal Data?**

Barmoor will only retain personal data for as long as is necessary to provide our services or for as long as we reasonably require the information for our lawful business purposes or comply with a statutory or other legal requirement. Please contact us if you require further information about our retention policies.

**Data Breaches**

In the event of any breach of Barmoor systems impacting on the security of any individual’s personal data, Barmoor will inform the affected individual~~s~~ at the earliest opportunity describing the nature of the breach, the possible consequences and the measures being taken to remedy the situation in accordance with our procedures and applicable law.

**Contact Us**

Please direct any comments or enquires relating to this policy to our Data Controller.

**Complaints**

If you are unhappy with the way in which Barmoor processes your personal data, please contact us using the information provided below. You also have the right to lodge a complaint before the Information Commissioner’s Office (ICO), the UK data protection authority. Their contact details as are follows: Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF; Tel: 0303 123 1113 (local rate) or 01625 545 745; or see their [website.](https://ico.org.uk/global/contact-us/)

**Updating this Policy**

From time to time we may change our data processing activities.

We will place an updated version on our website.

We will notify you of any changes to this policy as required by law.

 **Date: 3 February 2019**

**.**

**Appendix**

These cookies are used on our Wix website.

| ***Cookie name*** | ***Life span*** | ***Purpose*** |
| --- | --- | --- |
| svSession | Persistent | Identifies unique visitors and tracks a visitor’s sessions on a site |
| hs | Session | Security |
| XSRF-TOKEN | Session | Security |
| smSession | Persistent (Two weeks) | Identifies logged in site members |
| TSxxxxxxxx (where x is replaced with a random series of numbers and letters) | Session | Security |
| TSxxxxxxxx\_d (where x is replaced with a random series of numbers and letters) | Session | Security |
| RequestID | Session | Track visitor behaviour and measure site performance |