**LEARNERS COMMUNITY LIBRARY (LCL) DATA PRIVACY POLICY**

**May 2018**

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1. **About this Policy** 
   1. This policy explains when and why we collect personal information about our members, how we use it and how we keep it secure and your rights in relation to it.
   2. We may collect, use and store your personal data, as described in this Data Privacy Policy and as described when we collect data from you.
   3. We reserve the right to amend this Data Privacy Policy from time to time without prior notice. We may be required to amend this Data Privacy Policy due to regulations. Please check our website for the latest Privacy Policy.
   4. We have undertaken the registration self-assessment on the Information Commissioner Office website and are considered exempt from registration with them but we will always comply with the General Data Protection Regulation (**GDPR**) when dealing with your personal data. Further details on the GDPR can be found at the website for the Information Commissioner (www.ico.gov.uk). For the purposes of the GDPR, we will be the “controller” of all personal data we hold about you.
2. **Who are we?**  We can be contacted at learnerscommlib@hotmail.co.uk, or at Learners Community Library, Kitwood Unit, Herts and Essex Hospital, Haymeads Lane, Bishops Stortford, CM23 5JH. See our website for further details of who we are, what we do etc. at www.learnerscommunitylibrary.com

**What information we collect and why.**

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| --- | --- |
| Member's name, names of children, address  telephone numbers  e-mail address(es)  school or pre-school attended  car registration | Management of membership issues eg concessions, discounts, renewals, opening time changes, recovery of outstanding loans/fines, updates, Christmas cards for children.  Sharing good news e.g. re funding  Conforming with hospital’s car parking policy ensuring that free car parking pass is not being used outside LCL sessions |
| Date of birth / age related information | In the future only children’s age and school year will be collected not dob.  Monitor spread of ages to review usefulness of LCL and order age related resources etc.  Introduce staff and parents to school transition materials at an appropriate time. |
| Photos in displays, on the website, in our leaflets and in press releases of members/donors/volunteers | We always seek consent at the time photos are taken.  Consent may be withdrawn at any time by contacting  us by e-mail or letter. |
| Member’s contact details | Creating and managing members’ contact list.  We will seek consent via our revised GDPR membership form for new members.  For current members we will check their information is up to date and seek agreement to it being used in line with our privacy policy on their visits to LCL.  The member may withdraw their consent at any time by  contacting us by e-mail or letter unless it conflicts with our legal obligations~~.~~ |
| Member’s and former  member’s name and e-  mail address | To conduct surveys of members and former  members for the benefit of analysing how LCL  can improve.  We will seek explicit consent via our revised GDPR  membership form for new members and on visits to  LCL from current members as above |
| List of donors and funders | Consent is provided when donations of time/equipment/money are made for names to be placed on LCL’s *‘Thank You Board’* and on our website and in our Annual Report to celebrate donations and positive funding applications |
| Volunteers’ details name, telephone number, email address, car registration | To inform volunteers as needed in relation to their roles within LCL  Conform to hospital requirement that free car parking pass only used when helping out at LCL |
| Volunteers’ details on website | To inform the public of the range of support available to them at LCL and celebrate the donated time from volunteers that makes LCL’s work possible.  Only volunteers’ details who have consented are displayed on the website. |
| Annual Reports and accounts | None of the monitoring information e.g. numbers of visitors and types of visitors, items lent etc is identified personally.  Consent is provided by donors named in the Annual Report.  Individual transactions in the annual accounts e.g. membership subscriptions are identified by initials only. |
| Information to provide Advice at Drop In | Members can bring specialist reports if they wish with them for us to read in order to help in problem solving, advice and identification of resources to use/make. These will be returned at the end of the meeting to the person who provided them. No copies will be kept. |

1. **How we safeguard your personal data** 
   1. We currently use a Hotmail email account [learnerscommlib@hotmail.co.uk](mailto:learnerscommlib@hotmail.co.uk) . Microsoft adheres to the principles of the EU-U.S. and Swiss-U.S. Privacy Shield frameworks
   2. We have implemented generally accepted standards of technology and operational security in order to protect personal data from loss, misuse, or unauthorised alteration or destruction. We have been advised that our virus checkers such as Windows Defender are considered to be adequate. Laptops used are password protected. Emails to groups of members are blind copied etc. We are currently reviewing our use of encryption. Our membership forms are be locked away when not in use. Our visitors book is kept in a locked cupboard between sessions
   3. Access to members information is generally limited to the (currently 3) people who deal with LCL’s administrative tasks. Membership forms are locked away when not in use.
   4. All volunteers @ LCL are asked to ensure that personal data is not on view to members of public when working on this in LCL sessions. Layout of LCL is currently being reviewed to facilitate this further.
   5. Please note however that where you are transmitting information to us over the internet this can never be guaranteed to be 100% secure.
   6. We currently do not take any payments from you on line. In the unlikely event that this changes, we will seek your permission to use a recognised online secure payment system and update this policy accordingly.
   7. All our membership lists are backed up to Dropbox. Dropbox adheres to the principles of the EU-U.S. and Swiss-U.S. Privacy Shield frameworks.
   8. We take donations online through a 3rd party, currently Local Giving and Giving Machine who have their own GDRP compliant privacy policies.
   9. We will review at least yearly that we are GDRP compliant.
   10. We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.

**Who else has access to the information you provide us?**

* 1. We will never sell your personal data. We will not share your personal data with any third parties without your prior consent (which you are free to withhold) except where required to do so by law or as set out in the table above.

1. **How long do we keep your information?** 
   1. We will hold your personal data on our systems for as long as you are a member of LCL and for as long afterwards as it is in LCL’s legitimate interest to do so or for as long as is necessary to comply with our legal obligations. We will review your personal data every year to establish whether we are still entitled to process it. If we decide that we are not entitled to do so, we will stop processing your personal data except that we will retain your personal data in an archived form in order to be able to comply with legal obligations e.g. annual accounts records etc.
2. **Your rights** 
   1. You have rights under the GDPR:
      1. to access your personal data
      2. to be provided with information about how your personal data is processed
      3. to have your personal data corrected
      4. to have your personal data erased in certain circumstances
      5. to object to or restrict how your personal data is processed
      6. to have your personal data transferred to yourself or to another business in certain circumstances.
   2. You have the right to take any complaints about how we process your personal data to the Information Commissioner:

<https://ico.org.uk/concerns/>

0303 123 1113.

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire SK9 5AF

For more details, please address any questions, comments and requests regarding our data processing practices to learnerscommlib@hotmail.co.uk