



St Dennis Parish Council General Privacy Notice

Your Personal Data – What is it?

Personal Data is any information about a living individual which allows them to be identified from that data (for example a name, photographs, videos, email address or address). Identification can be directly using the data itself or by combining it with other information which helps to identify a living individual (e.g. a list of staff may contain personal ID numbers rather than names but if you use a list a separate list with ID numbers which gives the corresponding names to identify the staff in the first list will also be treated as personal data). The processing of personal data is governed by legislation relating to that personal data which applies to the United Kingdom including the general data protection Regulation (GDPR) and other legislation relating to personal data and rights such as the Human Rights Act.

Who are we?

This Privacy Notice is provided to you by St Dennis Parish Council which is the data controller for your data.

Other Data Controllers the council works with:

- Local authorities
- Schools and colleges
- Community Groups
- Charities
- Other not for profit organisations
- Contractors
- Credit Reference agencies)

We may need to share your personal data we hold with them so that they can carry out their responsibilities to the council. If we and the other data controllers listed above are processing your data jointly or for the same purposes, then the council and the other data controllers may be joint data controllers which means we are all collectively responsible to you for your data. Where each of the parties listed above are processing your data for their own independent purposes then each of us will be independently responsible to you and if you have any questions, wish to exercise any of your rights or with to raise a complaint, you should do so directly to the relevant data controller.

A description of what personal data the council processes and for what purpose is set out in this privacy notice.

The Council will process some or all of the following personal data where necessary to perform its tasks:

- Names, titles and aliases, photographs;
- Contact details such as telephone numbers, addresses and email addresses;

- Where they are relevant to the service provided by a council, or where you provide them to us, we may process information such as gender, age, marital status, nationality, education/work history, academic/professional qualifications, hobbies, family composition and dependants;
- Where you pay for activities or a service, financial identifiers such as bank account numbers, payment card numbers, payment/transaction identifiers, policy numbers and claim numbers;
- The personal data we process may include sensitive or other special categories of personal data such as criminal convictions, racial or ethnic origin, mental and physical health, details of injuries, medication/treatment received, political beliefs, trade union affiliation, genetic data, biometric data, data concerning sexual life or orientation.

How we use sensitive personal data

- We may process sensitive personal data including, as appropriate:
 - Information about your physical or mental health or condition order to monitor sick leave and take decisions on your fitness to work;
 - Your racial or ethnic origin or religious or similar information in order to monitor compliance with equal opportunities legislation;
 - In order to comply with legal requirements and obligations to third parties;
- These types of data are described in the GDPR as special categories of data and require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal data.
- We may process special categories of personal data in the following circumstances
 - In limited circumstances, with your explicit consent.
 - Where we need to carry out our legal obligations.
 - Where it is needed in the public interest.
- Less commonly, we may process this type of personal data where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving consent, or where you have already made the information public.

Do we need your consent to process your sensitive personal data?

- In limited circumstances we may approach you for your written consent to allow us to process certain sensitive personal data. If we do so, we will provide you with full details of the personal data that we would like and the reason we need it, so that you can carefully consider whether you wish to consent.

The Council will comply with the data protection law. This says the personal data we hold about you must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is not incompatible with those purposes.

- Relevant to the purpose that we have told you about and limited only to those purposes.
- Accurate and kept up to date
- Kept as long as necessary for the purpose we have told you about.
- Kept and destroyed securely including ensuring that appropriate technical and security measures are in place to protect your personal data from loss, misuse, unauthorised access and disclosure.

We use personal data for some or all of the following purposes:

- To deliver public services including to understand your needs to provide the service that you request and to understand what we can do for you and inform you of other relevant services;
- To confirm your identity to provide some services;
- To contact you by post, email, telephone or using social media.
- To help us build a picture of how we are performing;
- To prevent and detect fraud and corruption in the use of public funds and where necessary for law enforcement functions.
- To enable us to meet all legal and statutory obligations and powers including any delegated functions;
- To carry out comprehensive safeguarding procedures (including due diligence and complaints handling) in accordance with best safeguarding practice from time to time with the aim of ensuring that all children and adults-at-risk are provided with safe environments and generally as necessary to protect individuals from harm or injury;
- To promote the interests of the council;
- To maintain our own accounts and records;
- To seek your views, opinions or comments;
- To notify you of changes to our facilities, services, events and staff, councillors and other role holders;
- To send you communications which you have requested and that may be of interest to you. These may include information about campaigns, appeals, other new projects or initiatives;
- To process relevant financial transactions including grants and payments for goods and services supplied to the council.
- To allow the statistical analysis so we can plan provision of services.

Our processing may also include the use of CCTV systems for the prevention and prosecution of crime.

How long will we keep personal data?

We will keep some records permanently if we are legally required to do so. We may keep some other records for an extended period of time. For example, it is currently best practice to keep records for a minimum of 8 years to support HMRC audits of provide tax information. We may have legal obligations to retain some data in connection with statutory obligations as a public authority. The council is permitted to retain data in order to defend or pursue claims. In some cases, the law imposes a time limit for such claims (for example 3 years for personal injury claims and 6 years for contract claims). We will retain some personal data for this purpose as long as we believe it is necessary to be able to

defend or pursue a claim. In general, we will endeavour to keep data only for as long as we need it. This means that we will delete it when it is no longer needed.

Your rights and your personal data

You have the following rights with respect to your personal data:

When exercising any of the rights listed below, in order to process your request, we may need to verify your identity for your security. In such cases we will need you to respond with proof of your identity before you can exercise these rights.

1) The right to access personal data we hold on you

- At any point you can contact us to request the personal data we hold on you as well as why we have that personal data, who has access to the personal data and where we obtained the personal data from. Once we have received your request we will respond within one month.
- There are no fees or charges for the first request but additional requests for the same personal data or requests that are manifestly unfounded or excessive may be subject to an administrative fee.

2) The right to correct and update the personal data we hold on you

- If the data we hold on you is out of date, incomplete or incorrect, you can inform us and your data will be updated.

3) The right to have your personal data erased

- If you feel that we should no longer be using your personal data or that we are unlawfully using your personal data, you can request that we erase the personal data we hold.
- When we receive your request, we will confirm whether the personal data has been deleted or the reason why it cannot be deleted for example we need it to comply with a legal obligation).

4) The right to object to processing of your personal data or to restrict it to certain purposes only

- You have the right to request that we stop processing your personal data or ask us to restrict processing. Upon receiving the request, we will contact you and let you know if we are able to comply or if we have a legal obligation to continue to process your data.

5) The right to data portability

- You have the right to request that we transfer some of your data to another controller. We will comply with your request, where is feasible so, within one month of receiving your request.

6) The right to withdraw your consent to the processing at any time for any processing of data to which consent was obtained.

- You can withdraw your consent easily by telephone, email or by post (see contact details below).

7) The right to lodge a complaint with the information Commissioners Office.

- You can contact the information commissioner's office on 0303 123 1113 or via email <https://ico.org.uk/ntactusmail/> at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF.

Transfer of data abroad

Any personal data transferred to countries or territories outside of the European Economic Area (EEA) will only be placed on systems complying with measures giving equivalent protection of personal rights either through international agreements or contracts approved with the European Union. Our website is also accessible from overseas so on occasion some personal data for example a newsletter may be accessed from overseas.

Further processing

If we wish to use your personal data for a new purpose, we are not covered by this Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and ceasing conditions. Where and whenever necessary will seek your prior consent to the new processing.

Changes to the notice

We keep this privacy notice under regular review and we will place updates on <https://stdennisparishcouncil.org.uk/>. This notice was last updated in July 2018

Contact Details

Please contact us if you have any questions about this Privacy Notice or the personal data we hold about you or to exercise all relevant rights, queries or complaints at:

St Dennis Parish Council
ClayTAWC Building
Fore Street
St Dennis
PL26 8AF
Tel: 01726 821700
Email: clerk@stdennisparishcouncil.org.uk

Adopted by St Dennis Parish Council on the 4th October 2018 Minute No: F23/18