

## **Dittisham Parish Council Privacy Policy**

### **1. Council information**

Dittisham Parish Council is the data controller for your data.  
Council contact details: parishclerk@dittishamparish.co.uk

### **2. To operate Dittisham Parish Council needs to process a range of information.**

In broad terms, this data can be classified as:

- Public data about its activities, including information it is required to make available to the public.
- Confidential information about other organisations which is commercially sensitive.
- Personal data about current, past and potential employees, Councillors, and volunteers.
- Personal data about individuals who contact it, for example for information or to make a complaint.

### **3. 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 by the personal data alone or in conjunction with any other personal data.

The processing of personal data is governed by legislation relating to personal data which applies in the United Kingdom including the General Data Protection Regulation (the “GDPR”) and other local legislation relating to personal data and rights such as the Human Rights Act.

### **4. What is the legal basis for processing your personal data?**

When processing your personal data, the Council will ensure that at least one of the following conditions is met:

- **Consent** - The individual has freely given informed consent to the processing
- **Contractual necessity** – To enter into a contract or agreement with the individual, or prior to doing so.
- **Compliance with a legal obligation.**
- **Vital Interests** – Such as in a life and death situation.
- **Public Interest** - For the performance of tasks carried out by a public authority.

**Sensitive personal data** relates to racial or ethnic origin, political opinions, religious beliefs, trade union membership, physical or mental health or condition, sexual life or orientation, genetic data, and biometric data.

Particular attention is paid to the processing of any sensitive personal information and the Parish Council will ensure that at least one of the following conditions is met:

- The explicit consent of the individual has been obtained;
- Council is required by law to process the data for employment purposes;
- Processing is required in order to protect the vital interests of the individual or another person.

### **5. The Council will comply with data protection law. This says that 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 incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.

- Accurate and kept up to date.
- Kept only as long as necessary for the purposes 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 to protect personal data from loss, misuse, unauthorised access and disclosure.

## **6. 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.

- (i) The right to access personal data we hold on you
- (ii) The right to correct and update the personal data we hold on you
- (iii) The right to have your personal data erased
- (iv) The right to object to processing of your personal data or to restrict it to certain purposes only
- (v) The right to data portability
- (vi) The right to withdraw your consent to the processing at any time for any processing of data to which consent was obtained
- (vii) The right to lodge a complaint with the Information Commissioner's Office.

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

## **7. Who are the data controllers?**

The Council routinely works in co-operation with other Councils, groups and individuals and employs contractors, such as a website service provider.

## **8. What personal is collected?**

- Names, titles, and photographs;
- Contact details such as telephone numbers, addresses, and email addresses;
- We access a current copy of the electoral register;
- Where they are relevant to the services provided by the Council, or where you provide them to us, we may process demographic information such as gender, age, family composition, and dependants;
- Occasionally financial identifiers such as bank account numbers;
- Website data – The Council's website incorporates Google analytics to monitor website traffic. No personal data, such as IP address or user id, is collected.

## **9. We use your personal data for some or all of the following purposes:**

- To deliver public services including to understand your needs to provide the services 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 (e.g., Facebook, Twitter, WhatsApp);
- To help us to build up a picture of how we are performing;
- To prevent and detect fraud and corruption in the use of public funds and where necessary for the 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 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 of data so we can plan the provision of services.

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

## **10 Sharing your personal data**

The council will implement appropriate security measures to protect your personal data. This section of the Privacy Policy provides information about the third parties with whom the council will share your personal data. These third parties also have an obligation to put in place appropriate security measures and will be responsible to you directly for the manner in which they process and protect your personal data. We may need to share your data with some or all of the following (but only where necessary):

- On occasion, other local authorities or not for profit bodies with which we are carrying out joint ventures e.g. in relation to facilities for the community.
- Our agents, suppliers and contractors.

## **11. How long do we keep your personal data?**

We will keep some records permanently if we are legally required to do so and some other records for an extended period of time. For example, it is current best practice to keep financial records for a minimum period of 6 years to support HMRC audits or provide tax information. We endeavour to keep data only for as long as we need it.

There is further detail in our Retention and Disposal Policy

## **12. Transfer of Data Abroad**

Our website is also accessible from overseas so on occasion some personal data (for example in minutes) may be accessed from overseas.

Any personal data transferred to countries or territories outside 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 by the European Union.

## **13. Further processing**

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

## **14. Changes to this policy**

We keep this Privacy Policy under regular review and we will place any updates on [this web page](#). This Policy was approved 7 November 2018. Contact detail updated.

#### **15. Contact Details**

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

The Data Controller, Dittisham Parish Council

Email: [parishclerk@dittishamparish.co.uk](mailto:parishclerk@dittishamparish.co.uk)