LYTCHETT MATRAVERS PARISH COUNCIL
PRIVACY POLICY

1. Introduction

1.1 Lytchett Matravers Parish Council is fully committed to compliance with the requirements of the UK General Data Protection Regulation (UK GDPR), and Data Protection Act 2018 (DPA 2018).

1.2 The Council will therefore follow procedures that aim to ensure that all employees, elected members, contractors, agents, consultants, partners or other servants of the council who have access to any personal data held by or on behalf of the council, are fully aware of and abide by their duties and responsibilities under the UK GDPR and DPA 2018 and that the Council remains committed to protecting and respecting the privacy of all who provide their data.

1.3 For the purpose of the UK GDPR and DPA 2018, the data controller is:
Lytchett Matravers Parish Council, Parish Office, Vineyard Close, Lytchett Matravers, POOLE BH16 6DD.

2. Statement of Policy

2.1 In order to operate efficiently, the Parish Council has to collect and use information about people with whom it works. This may include members of the public, current, past and prospective employees, clients and customers, and suppliers. In addition, it may be required by law to collect and use information to comply with the requirements of central government. This personal information must be handled and dealt with properly, however it is collected, recorded and used, and whether it be on paper, in computer records or recorded by any other means there are safeguards within the UK GDPR and DPA 2018 to ensure this. The Parish Council regards the lawful and correct treatment of personal information as very important to its successful operations and to maintaining confidence between the council and those with whom it carries out business. The Parish Council will ensure that it treats personal information lawfully and correctly. Personal data may be processed on the basis that such processing is necessary for the performance of tasks carried out by public authority acting in the public interest, out of contractual necessity or on a lawful basis.

Where appropriate, the Parish Council will seek the consent of individuals and companies to hold their personal data, where possible to do so. Records of those consenting will be kept.

2.2 Article 5 of the General Data Protection Regulation requires that personal data shall be:

- Processed lawfully, fairly and in a transparent manner in relation to individuals.
- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes.
- Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that is inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.
- Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest,

scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals;

- Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

3. Privacy Policy

3.1 Lytchett Matravers Parish council is committed to protecting and respecting the privacy of everyone and of ensuring it is fully compliant under the UK GDPR and DPA 2018.

3.2 This policy (together with any other documents referred to within it) sets out the basis on which any personal data we collect, or is provided to us, will be processed. The following policy sets out the Parish Council's practices regarding the collection and processing of personal data and how we treat it.

4. Personal Data we may collect:

4.1 "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. The processing of personal data is governed by legislation relating to personal data which applies in the United Kingdom including the UK General Data Protection Regulation (UK GDPR), Data Protection Act (2018) and other legislation relating to personal data and rights such the Privacy and Electronic Communications Regulations and the Human Rights Act.

5. Data Controllers:

5.1 Lytchett Matravers Parish Council is the data controller for all data collected.
Other data controllers the council works with:

- Parish, District and County Councillors
- Local groups and organisations (Volunteers/Allotment holders)
- Dorset Council
- Charities
- Contractors

5.2 We may need to share personal data that 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 data jointly for the same purposes, then the council and the other data controllers may be "joint data controllers" which mean we are all collectively responsible for the data. Where each of the parties listed above are processing data for their own independent purposes then each of us will be independently responsible.

6. What data do we process?

6.1 The council will process some, or all, 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 services 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 such as use of a council venue, 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.

7. How we use sensitive personal data

- We may process sensitive personal data in order to comply with legal requirements and obligations to third parties (defined as special category data in UK GDPR).
- We need to have further justification for collecting, storing and using this type of personal data e.g. employment.
- We may process special categories of personal data in the following circumstances:
    - In limited circumstances, with explicit written 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 an individual's interests and they are not capable of giving consent, or where the information is already public.

8. Do we need consent to process sensitive personal data?

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

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

- To deliver public services, including to understand individuals needs to provide the services that they request and to understand what we can do for the individual and inform them of other relevant services.
- To confirm identity to provide some services.
- To contact 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; (see Safeguarding Policy).
- To promote the interests of the council.
- To maintain our own accounts and records.
- To seek views, opinions or comments.
- To notify of changes to our facilities, services, events and staff, councillors and other role holders.
- To send 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. What is the legal basis for processing your personal data?

10.1 The council is a public authority and has certain powers and obligations. Most of the personal data is processed for compliance with a legal obligation which includes the discharge of the council's statutory functions and powers. Sometimes when exercising these powers or duties it is necessary to process personal data of residents or people using the council's services. We will always take into account the interests and rights of the individual.

10.2 This Privacy Policy, and the Privacy Notices we display and distribute, set out the rights and the council's obligations to each individual. We may process personal data if it is necessary for the performance of a contract, or to take steps to enter into a contract. An example of this would be processing data in connection with the use of sports facilities, or the acceptance of an allotment garden tenancy. Sometimes the use of personal data requires consent, we will first obtain consent to use that data.

11. If you visit our website

11.1 The council also produces written materials with the aim of keeping the residents of the Parish informed of projects that the council is involved with. This content is published on our website, www.lytchettmatraversparishcouncil.gov.uk, which can be accessed without the need to register any personal data. Where we collect personal data via our website (e.g. if you complete a survey or provide feedback, or use the contact form), we will be upfront about it, and it will always be obvious why we need the personal data and how we will be using it.

When you access the website there is certain technical information which is recorded about your visit, but we are not able to identify you from this information. Such data may include how you arrived at our website, what browser you used and what pages you visited. We may also use cookies for the purposes of counting the number of hits to our website, again we are not able to identify you from this information.

Via the website it is possible to subscribe to receive updates posted to the website, for which the purposes the data (your email address) is held on the basis of consent. This functionality is provided by one of our service providers, WordPress, so when you subscribe to receive the update emails you will be required to sharing your email with WordPress. You are able to remove your consent at any time, by using the 'unsubscribe' link in any of the emails you have received from the website (you may need to login or use the "Email me a login link" to access your subscription options), or contacting the Parish Clerk at clerk@lytchettmatraversparishcouncil.gov.uk

12. Sharing personal data

12.1 This section provides information about the third parties with whom the council may share personal data. These third parties have an obligation to put in place appropriate security measures and will be responsible to the individual directly for the manner in which they process and protect personal data. It is likely that we will need to share data with some or all of the following (but only where necessary):

- The data controllers listed above under the heading "Other data controllers the council works with";
- Our agents, suppliers and contractors. For example, we may ask a commercial provider to publish or distribute newsletters on our behalf, or to maintain our database software.
- On occasion, other local authorities or not for profit bodies with which we are carrying out joint ventures e.g. in relation to facilities or events for the community.

13. How long do we keep personal data?

13.1 Your information is stored securely, and we are committed to ensuring that we do not retain any data longer than is necessary. The specific time will depend upon the nature of the data.

We will keep some records permanently if we are legally required to do so as a public authority, for example, data related to burial records. Other records will be maintained in line with relevant regulations and best practice. For example, it is currently best practice to keep financial records for a

minimum period of 6 years to support HMRC audits or provide tax information. We may have legal obligations to retain some data in connection with our 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 or 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.

14. Individual rights and their personal data

14.1 Individuals have the following rights with respect to personal data:
When exercising any of the rights listed below, in order to process a request, we may need to verify identity for security. In such cases we will need the individual to respond with proof of identity before they can exercise these rights.

The right to access personal data we hold

- At any point an individual can contact us to request the personal data we hold 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 a 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 which are manifestly unfounded or excessive may be subject to an administrative fee.

The right to correct and update the personal data we hold

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

The right to have personal data erased

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

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

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

The right to data portability

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

The right to withdraw consent to the processing of data to which consent was obtained

- Individuals can withdraw their consent easily by telephone, email, or by post (see Contact Details below).

The right to lodge a complaint with the Information Commissioner's Office.

- To lodge a complaint, individuals can contact the Information Commissioner's 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.

15. Transfer of Data Abroad

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

16. Further processing

16.1 If we wish to use personal data for a new purpose, not covered by the Privacy Policy or Privacy Notice, then we will provide you a new 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 prior consent to the new processing.

17. Changes to the Policy

17.1 We keep this Privacy Policy under regular review, and we will place any updates on the Parish Council's website at https://lytchettmtraversparishcouncil.gov.uk/privacy-policy

18. Contact Details

18.1 For advice and assistance please contact the Parish Council:

- Parish Office, Vineyard Close, Lytchett Matravers, POOLE BH16 6DD
- Email: clerk@lytchettmatraversparishcouncil.gov.uk
- Website: www.lytchettmatraversparishcouncil.gov.uk

You can also complain to the ICO if you are unhappy with how we have used your data.
The ICO's address:
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113
ICO website: https://www.ico.org.uk

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