



DATA PROTECTION POLICY

Purpose

This document is intended to provide information about how Bottisham Parish Council uses data. This information is provided because Data Protection Law gives individuals rights to understand how their data is used. *This document is in accordance with guidelines set down by NALC.*

Bottisham Parish Council is the data controller for your data. The council has appointed the Clerk as the person with responsibility for data protection compliance within the council. Questions about this policy, or requests for further information, should be directed to them.

This privacy statement is intended to cover the activities of Bottisham Parish Council. Keeping in touch with the Council's communities is a key strategy, and the Council strives to facilitate this on a daily basis.

Bottisham Parish Council is committed to being transparent about how it collects and uses data and to meeting data protection obligations. This policy sets out the council's commitment to data protection, and your rights and obligations in relation to personal data in line with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA).

Person(s) and/or Organisation's Data Shared With

Bottisham Parish Council works with a number of different public bodies and communities.

Organisations and individuals broadly fall into one of four categories:

- National and local government and their associated agencies
- National and local commercial organisations
- National and local voluntary organisations
- Private individuals

Other data controllers the council works with:

- Community groups
- Charities
- Other not for profit entities Contractors
- Credit reference agencies

The Council may need to share your personal data held 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 for the same purposes, then the Council and the other data controllers may be "joint data controllers" which mean 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 (see below) or wish to raise a complaint, you should do so directly to the relevant data controller.

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 personnel ID numbers rather than names but if you use a separate list of the ID numbers which give the corresponding names to identify the staff in the first list then the first list will also be treated as 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 legislation relating to personal data and rights such as the Human Rights Act.

The Councils Right to Process Information

- General Data Protection Regulations Article 6 (1) (a) (b) and (e)
- Processing is with consent of the data subject or
- Processing is necessary for compliance with a legal obligation or
- Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller

When You Contact Us

The information you provide (personal information such as name, address, email address, phone number, organisation) will be processed and stored to enable us to contact you and respond to your correspondence, provide information and/or access our facilities and services. Your personal information will be not shared or provided to any other third party.

Whose Data Does Bottisham Parish Council Hold?

Bottisham Parish Council holds personal data from a broad range of individuals from across our community.

Special Categories of Data

The Council will only process special categories of your personal data (see above) on the following basis in accordance with legislation:

- where it is necessary for carrying out rights and obligations under employment law or a collective agreement;
- where it is necessary to protect your vital interests or those of another person where you are physically or legally incapable of giving consent;

- where you have made the data public;
- where it is necessary for the establishment, exercise or defence of legal claims;
- where it is necessary for the purposes of occupational medicine or for the assessment of your working capacity;
- where it is carried out by a not-for-profit body with a political, philosophical, religious or trade union aim provided the processing relates to only members or former members provided there is no disclosure to a third party without consent;
- where it is necessary for reasons for substantial public interest on the basis of law which is proportionate to the aim pursued and which contains appropriate safeguards;
- where it is necessary for reasons of public interest in the area of public health; and
- where it is necessary for archiving purposes in the public interest or scientific and historical research purposes.

If the council processes special categories of your personal data in line with one of the above bases, it does not require your consent. In other cases, the council is required to gain your consent to process your special categories of personal data. If the council asks for your consent to process a special category of personal data, then we will explain the reason for the request. You do not have to consent or can withdraw consent later.

The Type of Personal Information Council Hold/Collect

Bottisham Parish Council may need to share your personal data we hold with other data controllers so that they can carry out their responsibilities to Bottisham Parish Council and its residents. If we and the other data controllers listed above are processing your data jointly for the same purposes, then Bottisham Parish Council and the other data controllers may be “joint data controllers” which mean 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 (see below) or wish to raise a complaint, you should do so directly to the relevant data controller.

Why Does Bottisham Parish Council Hold Data?

Bottisham Parish Council holds data in order to work with its communities. Whether as a resident or a member of an organisation, the council accepts that many parties have a legitimate interest in Bottisham Parish Council through their current or recent involvement with the council. All data held relates to individuals who have a pre-existing relationship with Bottisham Parish Council.

Bottisham Parish Council may use data for the purposes of:

- Invitations to events
- News provision
- Parish Council Meetings
- Volunteering opportunities
- Commercial transactions regarding the council's purchases or sales

What Data Does Bottisham Parish Council hold?

Bottisham Parish Council will process some or all of the following personal data where necessary to perform its day-to-day tasks. This data may vary from individual to individual according to personal link with the council and their level of engagement in recent years. The data held may include:

- Full name
- Date of birth
- Home and work contact details (addresses, telephone numbers, email addresses)
- Interests and involvement with Bottisham Parish Council
- Bank details (only for organisations and individuals who transact with Bottisham Parish Council)

Where they are relevant to the services provided by Bottisham Parish 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 and dependants;

Where you pay for services such as conference bookings, purchasing publications, or we pay you, for example, expense payments, financial identifiers such as bank account numbers, payment card numbers, payment/transaction identifiers;

The personal data we process may include sensitive or other special categories of personal data such as racial or ethnic origin, mental and physical health, details of injuries, medication/treatment received, political beliefs, trade union affiliation and biometric data.

How is the Data Collected?

Generally, Bottisham Council receives personal data from the individual directly. This may be via a form, or simply in the ordinary course of interaction or communication (such as email or phone calls).

However, in some cases personal data will be supplied by third parties (for example directories of suppliers); or collected from publicly available resources.

How is the Data Stored and Used?

The Data is stored and transmitted securely. Access is controlled and the data is used on a daily basis in a considered manner, in many different ways such as:

- Planning events
- Sharing Bottisham Parish Council news
- Circulating meeting papers for parish council meetings and annual meetings
- Overseeing registration and payment for events
- Identifying individuals who may want to support a specific project
- Arranging volunteering opportunities

Bottisham Parish Council will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Individuals should notify the parish clerk of any significant changes to important information, such as contact details held about them.

An individual has the right to request that any out-of-date, irrelevant or inaccurate or information about them is erased or corrected (subject to certain exemptions and limitations under Data Protection Law): please see above for details of why Bottisham Parish Council may need to process your data and of who you may contact if you disagree.

Bottisham Parish Council will take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around use of technology and devices, and access to systems.

How Bottisham Parish Council Processes Sensitive Data

We may process sensitive personal data including, as appropriate:

- 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 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 your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

Do Bottisham Parish Council 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.

Is Data Shared?

Data is not normally shared with external third parties. However, on occasions it may be shared after consent has been sought for a legitimate reason. Some examples of these are:

- Enable a principal authority to contact a resident about a concern they have raised;
- Encourage individuals to volunteer for an activity.

How Long Does Bottisham Parish Council Keep Personal Data?

Bottisham Parish Council will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. If you have any specific queries about how our retention policy is applied, or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact the parish clerk (contact details are below). A limited and reasonable amount of information will be kept for archiving purposes even where you have requested we no longer keep in touch with you, we will need to keep a record of the fact in order to fulfil your wishes (called a "suppression record").

Email Privacy

The content of e-mails sent from Bottisham Parish Council or any e-mail address ending in "@bottisham-pc.gov.uk" is confidential, may be legally privileged and is intended for the recipient specified in the message only. It is strictly forbidden to share any part of an e-mail message from Bottisham Parish Council or any e-mail address ending in "@bottisham-pc.gov.uk" with any third party, without written consent of the sender. If you received a message by mistake, please reply to the sender of the message stating that to be the case and then delete it.

Bottisham Parish Council, ensures that email security is a high priority. Therefore, we have put efforts into ensuring that the message is error and virus-free. Unfortunately, full security of the e-mail cannot be ensured as, despite our efforts, the data included in e-mails could be infected, intercepted, or corrupted. Therefore, the recipient should check the e-mail for threats with proper software, as the sender does not accept liability for any damage inflicted by viewing the content of an e-mail.

By Contacting Bottisham Parish Council or any e-mail address ending in “@bottisham-pc.gov.uk” you agree that your contact details may be held and processed for the purpose of corresponding with you.

You may request access to the information we hold on you by contacting the Clerk at clerk@bottisham-pc.gov.uk

You may request to be removed as a contact at any time by contacting the Clerk at clerk@bottisham-pc.gov.uk

Your Rights and 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. You have the following rights with respect to your personal data:

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 which are manifestly unfounded or excessive may be subject to an administrative fee.

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.

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 because we need it for to comply with a legal obligation).

The right to object to the 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.

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 it is feasible to do so, within one month of receiving your request.

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).

Individual responsibilities

You are responsible for helping the Council keep your personal data up to date. You should let the Council know if data, you have provided to the Council changes, for example if you move to a new house or change your bank details.

Everyone who works for, or on behalf of, the council has some responsibility for ensuring data is collected, stored and handled appropriately, in line with the council's policies.

You may have access to the personal data of other individuals and of members of the public in the course of your work with the council. Where this is the case, the council relies on you to help meet our data protection obligations to staff and members of the public. Individuals who have access to personal data are required:

- to access only data that you have authority to access and only for authorised purposes;
- not to disclose data except to individuals (whether inside or outside the council) who have appropriate authorisation;
- to keep data secure (for example by complying with rules on access to premises, computer access, including password protection, locking computer screens when away from desk, and secure file storage and destruction including locking drawers and cabinets, not leaving documents on desk whilst unattended);
- not to remove personal data, or devices containing or that can be used to access personal data, from the council's premises without prior authorisation and without adopting appropriate security measures (such as encryption or password protection) to secure the data and the device; and
- not to store personal data on local drives or on personal devices that are used for work purposes.
- to never transfer personal data outside the European Economic Area except in compliance with the law and with express authorisation from the Clerk or Chair of the Council
- to ask for help from the council's data protection lead if unsure about data protection or if you notice a potential breach or any areas of data protection or security that can be improved upon.

Access to Information - You have the right to request access to the information we have on you. You can do this by contacting our Data Information Officer: clerk@bottisham-pc.gov.uk

Information Correction / Deletion - If you believe that the information we have about you is incorrect, you may contact us so that we can update it and keep your data accurate. Please contact: clerk@bottisham-pc.gov.uk to request this.

Security

Data security is of great importance to the Bottisham Parish Council and to protect your data we have put in place suitable physical, electronic and managerial procedures to safeguard and secure your collected data.

We take security measures to protect your information including:

- Limiting access to our buildings to those that we believe are entitled to be there (by use of passes, key card access and other related technologies)
- Implementing access controls to our information technology
- Using appropriate procedures and technical security measures (including encryption and archiving techniques) to safeguard your information across all our computer systems, networks, website and office.

Changes to This Notice

We may update this privacy policy from time-to-time by posting a new version on our website. You should check this page occasionally to ensure you are happy with any changes.

Contact

Please contact us email clerk@bottisham-pc.gov.uk 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

Alternatively, you can contact the National Association Local Councils:

The Data Controller, National Association of Local Councils, 109 Great Russell Street, London, WC1B 3LD

Email: nalc@nalc.gov.uk

Conclusion:

In accordance with the law, we only collect a limited amount of information about you that is necessary for correspondence, information and service provision. We do not use profiling, we do not sell or pass your data to third parties. We do not use your data for purposes other than those specified. We make sure your data is stored securely. We delete all information deemed to be no longer necessary. We constantly review our Privacy Policies to keep it up to date in protecting your data. (You can request a copy of our policies at any time).