



# DATA PRIVACY NOTICE

## Waldringfield Parish Council

### Introduction

A new law called the General Data Protection Regulation ('GDPR') governing the processing of personal data came into effect on the 25<sup>th</sup> May 2018. Waldringfield Parish Council ('WPC') must comply with its requirements, just like any other organisation. A description of what personal data WPC processes and for what purposes is set out in this Privacy Notice. It also describes your rights with regard to personal data WPC holds.

WPC only holds the minimum data necessary to carry out its duties, and will always endeavour to process that data lawfully, keep it secure and uphold your rights over your personal data, as described below.

### 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.

### Who are we?

This Privacy Notice is provided to you by Waldringfield Parish Council (WPC), which is the data controller for your data. This means it decides how your personal data is processed and for what purposes

### Other data controllers WPC works with

We may need to share your personal data we hold with other organisations so that they can carry out their responsibilities to WPC. If we and the other data controllers are processing your data jointly for the same purposes, then WPC 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 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.

### WPC 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 services provided by WPC, 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

The reasons for processing the different types of data, and the legal basis for processing them are shown below:

Type of Data	Purpose	Legal Basis of Processing
Name, address, phone number, email address	Communication with member of the public	<b>Public task.</b> Parish Councils have a statutory obligation to communicate with members of the public, to keep them informed of parish issues and address

		parishioners' concerns.
Name, address, phone number, email address	List of deliverers of the parish newsletter	<b>Public task.</b> As above.
Name, company address, company phone number, company email address	Communication with company providing services to WPC.	<b>Contract.</b> Parish Councils need to pay for services to fulfil their legal obligations to maintain council facilities, e.g. grass cutting, play equipment maintenance.
Name, organisation's address, organisation's phone number, organisation's email address	Communication with officer or member of local government organisation (e.g. SCC, SCDC, AONB, DEP, etc.)	<b>Public task.</b> Parish Councils need to communicate with officers or members of local government organisations, e.g. on planning issues.

**WPC 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.

**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. Waldringfielders)
- 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 WPC
- 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 WPC
- To allow the statistical analysis of data so we can plan the provision of services.

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

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

We may process personal data if it is necessary for the performance of a contract with you, or to take steps to enter into a contract. An example of this would be processing your data in connection with maintenance work undertaken by you for WPC.

Sometimes the use of your personal data requires your consent. We will first obtain your consent to that use.

## **Sharing your personal data**

This section provides information about the third parties with whom WPC may share your personal data. These third parties 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. It is likely that we will need to share your data with some or all of the following (but only where necessary):

- The data controllers listed above under the heading "Other data controllers WPC works with".
- Our agents, suppliers and contractors. For example, we may ask a commercial provider to publish or distribute newsletters on our behalf.
- 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.

## **How long do we keep your 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 financial records for a minimum period of 8 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. WPC 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.

## **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 which 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 because 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 it is feasible to do 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 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.

## **Transfer of Data Abroad**

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].

## **Further processing**

If we wish to use your personal data for a new purpose, 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 processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

## **Changes to this notice**

We keep this Privacy Notice under regular review and we will place any updates on this web page <http://waldringfield.onesuffolk.net/parish-council/council-documents-online/>. This Notice was last updated in May 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:

David Lines  
43, Fourth Avenue, Frinton-on-Sea, Essex CO13 9DY  
Email: [pc.waldringfield@googlemail.com](mailto:pc.waldringfield@googlemail.com)  
Tel: 01255 678888 (with voicemail)