

# **PENSAX PARISH COUNCIL PRIVACY POLICY – SEPTEMBER 2018**

## **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, email address, 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 UK including the General Data Protection Regulation (the “GDPR”) and other local legislation relating to personal data and rights such as the Human Rights Act.

**This Privacy Policy is provided to you by Pensax Parish Council which is the data controller for your data. Contact details for the Clerk to the Parish Council are at the end of this notice.**

## **Other data controllers the Council works with –**

- Worcestershire County Council and Malvern Hills District Council
- Local Community groups, Local Charities and Local not for profit entities,
- Contractors Working for the Council.

We may need to share your personal data 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 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 party 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.

## **What personal is collected?**

- Names, titles, and aliases, photographs, 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 demographic
- information such as gender, age, marital status, nationality, education/work histories, academic/professional qualifications,
- hobbies, family composition, and dependants;
- Financial identifiers such as bank account numbers, payment card, payment/transaction identifiers, policy numbers, and
- claim numbers;
- The data we process may include sensitive personal data or other special categories of data such as racial or ethnic origin,
- mental and physical health, details of injuries medication/treatment received, political beliefs, trade union affiliation.

## **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 from loss, misuse, unauthorised access and disclosure.

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

- To deliver public services, to understand your needs, to provide services that you request, to inform you of other relevant services;
- To confirm your identity to provide some services;
- To contact you by post, email, telephone;
- To help us to build up a picture of how we are performing, to promote the interests of the Council;
- To prevent and detect fraud and corruption in the use of public funds and where necessary for the law enforcement of functions;
- To enable us to meet all legal/statutory obligations and powers including any delegated functions;
- To maintain our own accounts and records;
- To seek your views/opinions/comments;
- To notify you of changes to our facilities/services/events/staff/councillors and other role holders;
- To send you information which you have requested and that may be of interest to you. These may include information about campaigns/appeals/Police alerts and 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.

# **PENSAX PARISH COUNCIL**

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

The council 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 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 your interests and rights. This Privacy Policy sets out your rights and the council'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. Sometimes the use of your personal data requires your consent. We will first obtain your consent to that use.

### **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. It is likely that we will need to share your data with some or all of the following (but only where necessary):

- Our 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 current 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. 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.

### **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.

- ✓ *The right to access personal data we hold on you*
- ✓ *The right to correct and update the personal data we hold on you*
- ✓ *The right to have your personal data erased*
- ✓ *The right to object to processing of your personal data or to restrict it to certain purposes only*
- ✓ *The right to data portability*
- ✓ *The right to withdraw your consent to the processing at any time for any processing of data to which consent was obtained*
- ✓ *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

### **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.

### **Changes to this notice –**

We keep this Privacy Notice under regular review and we will place any updates on this web page -  
**<http://e-services.worcestershire.gov.uk/MyParish>**

This Notice was last updated in September 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:**

**The Data Controller, Sue Burrows, Clerk to Pensax Parish Council. 5 Summit Road, Clows Top DY14 9HN  
Email: [pensacpc14@btinternet.com](mailto:pensacpc14@btinternet.com) – T 01299 832722**