



COTFORD ST LUKE PARISH COUNCIL

The Community Centre, Bethell Mead, Cotford St Luke, Taunton TA4 1HZ www.cotford-st-luke.org.uk

COTFORD ST LUKE PARISH COUNCIL PRIVACY NOTICE 2021/2022

Applicable to employees, councillors, contractors and other service providers, residents of Cotford St Luke, members of the public and press.

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.

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 (GDPR) and other legislation relating to personal data and rights such as the Human Rights Act.

WHO ARE WE?

Cotford St Luke Parish Council is the ‘data controller’. This Privacy Notice explains how Cotford St Luke Parish Council processes personal data.

CSL PC SHARES PERSONAL DATA WITH THE FOLLOWING ORGANISATIONS

- Government departments
- Somerset West and Taunton Council
- National and Local Association of Local Councils (NALC & SALC)
- Local authorities
- Other public sector bodies and not for profit entities
- HMRC
- Contractors and service providers
- Somerset Web Services
- Cotford St Luke Community Centre

We may need to share your personal data we hold with organisations so that they can carry out their responsibilities to the parish council. Each of these bodies are independently responsible to you regarding your personal data. 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. A description of what personal data CSLPC processes and for what purposes is set out in this Privacy Notice.

PERSONAL DATA THAT MIGHT BE COLLECTED BY THE PARISH COUNCIL

- Name, title, alias, photographs, telephone number, postal and email address.

- The personal data of employees 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.

PERSONAL DATA MIGHT BE PROCESSED IN THE FOLLOWING WAYS

- We may process sensitive personal data including, as appropriate information about your physical or mental health or condition in order to monitor sick leave and take decisions on your fitness for work; 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 limited circumstances, with your explicit written consent;
 - where we need to carry out our legal obligations
 - where it is needed in the public interest
 - 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.

DOES THE CSLPC 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.

CONDITIONS OF HOLDING PERSONAL DATA

GDPR states that personal data can be retained subject to the following conditions;

- It 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 if 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.

PERSONAL DATA IS PROCESSED FOR SOME OR ALL OF THE FOLLOWING PURPOSES

- To deliver member 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, telephone or email.
- To help us to build up a picture of how we are performing.
- To enable us to meet all legal and statutory obligations.
- To promote the interests of CSL PC.
- To maintain our own accounts and records.
- To seek your views, opinions or comments.
- To notify you of changes to our services, events and staff, committee members and other role holders.
- To send you communications that may be of interest to you.
- These may include information about campaigns, consultations, other new projects or initiatives.

WHAT IS THE LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA?

- CSL PC processes personal data which is necessary for the performance of a contract to which you may be a party to.
- CSL PC processes personal data, which is necessary to comply with its legal obligations, for example, providing personal information to regulators and statutory bodies.
- CSL PC processes personal data in order to meet its legitimate interests as a Parish Council, e.g. delivering newsletters.
- Sometimes the use of your personal data may require your consent.

SHARING YOUR PERSONAL DATA

The CSLPC will not share your information to third parties unless it is in the process of Parish Council Business and only then if absolutely necessary.

HOW LONG DOES CSL PC KEEP YOUR PERSONAL DATA?

We will keep some records permanently, for example, all meeting minutes. 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. The CSLPC 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;

- *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).

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

You can contact the Information Commissioners Office on 0303 123 1113 or at ICO, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

PARISH COUNCIL WEBSITE www.cotford-st-luke.org.uk

- Our web provider collects details of visits to the website and the pages that you access. These are details which cannot identify you personally.
- Information that you provide by filling in the form on the Contact Us page and information provided to us when you communicate with us for any reason will only be used for the sole purpose of communicating with you, it will not be used for any other purpose and will not be passed onto any third party. If you wish us to delete your information, then please let us know accordingly.

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 our latest news) 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.

SECURITY

Data security is of great importance to the 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 laptop to those that we believe are entitled to access
- 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, and website.

CHANGES TO THIS NOTICE

The parish council will keep this Privacy Notice under regular review, and we will place any updates on the web site.

CONTACT

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:

clerk@cotford-st-luke.org.uk

This document was formulated from the Privacy Statement of the Society of Local Clerks (SALC) July 2019.

Adopted 6th May 2021

For review May 2022

Signed Cllr Adrian Coucher Chairman



Signed Louisa Gillett Parish Clerk and Responsible Financial Officer

