

## Privacy Policy of Beenham Parish Council

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 local legislation relating to personal data and rights such as the Human Rights Act.

### 1. Council information

This Privacy Policy is provided to you by Beenham Parish Council which is the data controller for your data.

### 2. The personal data we collect:

- Contact information (such as email) and other personal information (names and addresses)
- Where you pay for activities such as use of parish council facilities, financial identifiers such as bank account numbers, claim numbers

For a full list of data collected, see appendix D for more details

### 3. 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 to protect personal data from loss, misuse, unauthorised access and disclosure.

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

- To contact you by email (for example, about changes to local activities)
- To maintain our own accounts and records;
- To send you communications which you have requested and that may be of interest to you.
- To process relevant financial transactions including grants and payments for goods and services supplied to the council

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

See appendix D for more details

### 6. Sharing your personal data

The council will implement appropriate security measures to 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):

We ask a commercial provider to maintain our database software

#### 7. The length we keep your data:

We may keep some other records for an extended period of time. For example, it is legal requirement to keep financial records for a minimum period of 8 years to support HMRC audits or provide tax information. We will endeavour to delete the rest of your data as soon as is practically possible

See appendix D for more details

#### 8. You have rights including:

- (i) The right to access personal data we hold on you
- (ii) The right to correct and update the personal data we hold on you
- (iii) The right to have your personal data erased
- (iv) The right to object to processing of your personal data or to restrict it to certain purposes only
- (v) The right to withdraw your consent to the processing at any time for any processing of data to which consent was obtained

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.

#### 9. 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.

#### 10. Changes to this policy

We keep this Privacy Policy under regular review and we will place any updates on this web page: <http://www.beenhamonline.org/govt.htm>

#### 11. Contact Details

Please contact us if you have any questions about this Privacy Policy or the personal data we hold about you or to exercise all relevant rights, queries or complaints at:

The Data Controller, Beenham Parish Council, care of the Parish Clerk, Seif Morbi

Email: [theclerk@beenhamonline.org](mailto:theclerk@beenhamonline.org)

## APPENDIX D: GDPR – Data held by the Parish Council and Roles

This table identifies data held by Beenham Parish Council in April 2018, where the data originates, with whom it is shared, the basis for processing the data and the proposed retention period for the data. It has been compiled as part of the implementation of GDPR

	Data held	Where it came from	Shared with whom	Basis for processing data	Data Retention
1.	Register of Councillors' interests: Councillor contact details, name, address, telephone, mobile, email, personal profile etc. including 'declaration of Interest' form	Application to be a Parish Councillor	Parish Notes (name, tele and address) Parish web site (photo, name, address, brief personal profile, telephone / mobile number) Parish Clerk	Public Interest	While Councillor is in office. To be removed from Parish Notes and web site within 3 months of leaving office; plus held by Parish Clerk for up to 15 months after leaving office.
2.	Email address for information distribution list; first name, surname and email	Application by email address holder	Webmaster only (plus Host for server)	Consent	Individuals can request removal
3.	Correspondence from public; name, address, potentially email address and telephone number	Unsolicited correspondence from members of the public	Parish Councillors and Clerk; minimal data only to be shared, and only if necessary to resolve topic.	Public Interest	No more than 15 months after resolution. Parish Councillors to remove information from personal files as soon as possible.
4.	Staff information: Name, address, DOB, Remuneration, NI, tax code, bank account, sickness, disciplinary, training records etc.	Employees as part of usual employment procedures. Job applicants during recruitment process.	Statutory authorities as legal requirement. Parish Councillors for job recruitment process.	Legal Requirement	Throughout period of employment, as per legal obligations. After employment data will be

					retained in line with statutory requirements. Non-statutory information from job applicants deleted within 12 months.
5.	Volunteers; name, address, email, telephone number.	Volunteers	N/A	Public Interest	While volunteer is performing the task; deleted within 15 months of leaving role.
6.	Hirers of Community facilities. Name, address, tele, email address.	Information provided by Hirer.	Name shared with cleaner who unlocks the facilities.	Contractual necessity	Deleted within 15 months after contract.
7.	Web site information for Clubs and Societies. Contact name, email, tele for further information	Information provided by contact individual	Publicly available on the Parish web site.	Public Interest	Deleted from web site and processing emails within 3 months when requested by individual.

## Roles

The following list defines roles within the Parish Council which will support the implementation of GDPR. Some of the roles are obligatory:

Data Controller (Obligatory) – Full Parish Council, represented by the Chairman. Overall responsible for Data Processing activities and compliance with GDPR

Data Processors – Parish Clerk, Booking Clerk, Webmaster. This is any organisation who processes personal data on behalf of the Data Controller.

Data Protection Officer (Recommended for a Parish Council) – named Parish Councillor. Must have appropriate knowledge of GDPR and will advise on internal compliance, particularly when new processes are introduced.

Data Protection Compliance Officer (day to day central support and guidance in respect of compliance with processes that cover GDPR). – Parish Clerk

This Policy was last updated in May 2018.