

# WHITBOURNE PARISH COUNCIL

## Privacy Policy

Version: 2 | Status: Approved

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Next review: May 2027

This policy explains how Whitbourne Parish Council complies with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. It applies to personal data processed by or on behalf of the Council and should be read with the Council's privacy notices, retention arrangements, Subject Access Policy and data-protection complaints procedure.

### 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 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 United Kingdom including the UK General Data Protection Regulation (UK GDPR) and other local legislation relating to personal data and rights such as the Human Rights Act.

### Council information

Whitbourne Parish Council is the controller. For data-protection enquiries, rights requests and complaints, contact the Clerk, Whitbourne Parish Council, Stockings Barn, Whitbourne, Herefordshire WR6 5SR. Email: whitbournepccclerk@outlook.com. The Council will publish the contact details of a data protection officer only if it appoints one.

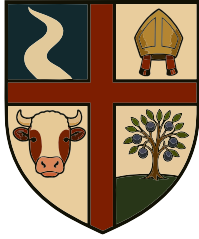
The Council will process some or all of the following personal data where necessary to perform its tasks

Depending on the relevant activity, the Council may process:

- names and contact details;
- correspondence, enquiries and consultation responses;
- meeting, governance and statutory records;
- finance, supplier, contract, grant and payment records;
- information relating to staff, councillors, applicants, volunteers, contractors and other role holders where applicable; and
- information needed to administer a Council service, asset or facility actually operated by the Council.

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.



# WHITBOURNE PARISH COUNCIL

- 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;
- To prevent and detect fraud and corruption in the use of public funds;
- To enable us to meet all legal and statutory obligations and powers including any delegated functions;
- To maintain our own accounts and records;
- To seek your views, opinions or comments;
- 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 the Council;

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

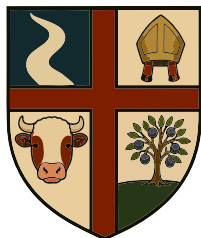
We use personal data only where necessary for a specified purpose. Depending on the activity, our lawful basis is one or more of:

- public task or official authority, where processing is necessary for the Council's own statutory functions, duties or powers;
- legal obligation, where legislation requires the processing;
- contract, or steps requested before entering a contract;
- consent, where consent is appropriate and can be freely withdrawn; or
- another lawful basis permitted by data-protection law.

We record the purpose and specific lawful basis for each processing activity. We do not rely on recognised legitimate interests for processing necessary to perform the Council's own public tasks or official functions.

## **Sharing your personal data**

We share personal data only where this is necessary and lawful. A service provider that processes personal data only on our behalf acts as our processor, on our documented instructions and under an appropriate contract. An organisation processing personal data for its own purposes is an independent controller and is responsible for that processing. If we and another organisation jointly determine the purposes and means of processing, we



# WHITBOURNE PARISH COUNCIL

will document the joint-controller arrangement and make its essence available to affected individuals. The applicable privacy notice will identify the actual recipients or categories of recipient.

## **How long do we keep your personal data?**

We retain personal data in accordance with the Council's approved retention arrangements, applicable legal duties and the need to establish, exercise or defend legal claims. The applicable retention period, or the criteria used to determine it, will be provided for the relevant processing activity on request. We securely delete or anonymise personal data when it is no longer required.

## **Your rights and your personal data**

Depending on the circumstances and the lawful basis used, you may have rights of access, rectification, erasure, restriction, objection and data portability. You may also withdraw consent at any time where consent is the basis for processing. Withdrawal does not affect processing carried out before withdrawal.

Some rights do not apply in every case; for example, data portability does not apply to processing necessary for the Council's public tasks. We may ask for proportionate evidence of identity only where we have reasonable doubts about identity.

### **Right to object**

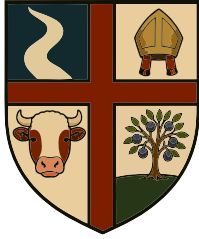
Where we process personal data because it is necessary for a public task or the exercise of official authority, you have the right to object on grounds relating to your particular situation. We will stop the processing unless we demonstrate compelling legitimate grounds which override your interests, rights and freedoms, or the processing is needed for legal claims.

## **Data-protection complaints**

You may make a data-protection complaint to the Clerk by email or post using the contact details in this document. We will facilitate the making of complaints, acknowledge receipt within 30 days, take appropriate steps to investigate and respond without undue delay, keep you informed of progress where appropriate, and tell you the outcome. You may also complain to the Information Commissioner's Office (ICO). Current ICO contact details are available at <https://ico.org.uk/make-a-complaint/>.

## **International transfers**

If we make a restricted transfer of personal data outside the United Kingdom, we will ensure that it is covered by UK adequacy regulations, appropriate safeguards or an applicable exception. Where required, we will complete the data protection test and will provide information about the safeguard on request. The fact that information on the Council's website can be viewed from overseas does not, by itself, mean that the Council has made a restricted transfer.



# WHITBOURNE PARISH COUNCIL

## **Further processing**

Before using personal data for a new purpose, we will identify a lawful basis, assess whether the new purpose is compatible with the original purpose where required, and provide updated privacy information where the UK GDPR requires. Consent will be sought only where it is the appropriate lawful basis.

## **Changes to this policy**

We keep this policy under regular review and publish the current version on the Council's website. The controlled version will state its adoption date, minute reference, version and next review date.

## **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 Clerk, Whitbourne Parish Council, Stockings Barn, Whitbourne, Herefordshire WR6 5SR. Email: [whitbournepcclerk@outlook.com](mailto:whitbournepcclerk@outlook.com).