



Controlled Document

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Privacy Policy and Procedure

INTRODUCTION

This procedure tells you what to expect us to do with your personal information when you provide us with your details.

Lenham Parish Council is the data controller of the personal information we process, unless otherwise stated. This means the Parish Council determines the purpose for which, and the manner in which, any personal data is to be processed.

The Parish Council Clerk and Responsible Officer will oversee and monitor the Parish Council's data protection procedures and ensure we remain compliant with the General Data Protection Regulation and Data Protection Act 2018. The Parish Council Clerk and Responsible Officer can be contacted by email clerk@lenhamparishcouncil.org.uk.

WHAT IS PERSONAL INFORMATION

Personal information can be any information relating to a living person who can be directly or indirectly identified by reference to an identifier. A personal identifier included your name, address, online identifier and identification number.

The categories of information that we collect, hold and share where necessary to perform our tasks include:

- Names, titles and aliases;
- Contact details such as telephone numbers, addresses, and email addresses;
- Where they are relevant to the services provided by Lenham Parish Council, 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 dependents;
- Where you pay for activities such as a council hall, financial identifiers such as bank account numbers, payment card numbers, payment/ transaction identifiers, policy numbers, and claim numbers;
- The personal data we process may include sensitive or other special categories of personal data such as criminal convictions, racial or ethnic origins, mental and physical health, details of injuries, medication/ treatment received, political beliefs, trade union affiliation, genetic data, biometric data, data concerning and sexual life or orientation.
- Photographs for newsletters, social media (including Parish Council Facebook page and Twitter) and promotional purposes;
- CCTV images.

What is 'Special Category' personal information?

Some information is 'special' and needs more protection due to its sensitivity. Its often information you would not want widely know and is very personal to you. This is likely to include anything that can reveal your:

- Sexuality and sexual health
- Religious or philosophical beliefs
- Ethnicity
- Physical or mental health
- Trade union membership
- Political opinion
- Genetic/ biometric data

We may process your special category data in the following circumstances:

- Where we need to carry out our legal obligations
- Where it is needed in the public interest and;
- Less commonly, 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.

In limited circumstances, we may approach you for your written consent to allow us to process certain special category 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.

Why we collect and use your information

We use your personal data for the following purposes:

- To deliver public services including understanding your needs to provide the services that you request and to understand what we can do you for and inform you of other relevant services;
- To confirm your identity to provide some services;
- To contact you by post, email or telephone or using social media (e.g. Facebook, Twitter, WhatsApp);
- To help 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 and delegated functions;
- To carry out comprehensive safeguarding procedures (including due diligence and compliant 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 the Parish Council;
- 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 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 Parish Council;
- To allow the statistical analysis of data so we can plan the provision of services. Our processing may also include the use of CCTV systems for the prevention and prosecution of crime.

The lawful basis on which we use this information

Lenham Parish Council is a public authority and has certain powers and obligations and holds the legal right to collect and use public data. Most of your personal data will be processed in compliance with a legal obligation which includes the discharge of the Parish Council statutory functions and powers.

Sometimes when exercising these powers or duties it is necessary to process personal data of residents of people using the Parish Council service. We will always take into account your interests and rights. This Privacy Notice sets out your rights and the Parish Council obligation to you.

In circumstances where the Parish Council requires your consent to use your personal information, you have the right to remove it at any time. If you want to remove our consent, contact the Parish Council Clerk and Responsible Officer at clerk@lenhamparishcouncil.org.uk.

We may also collect and use personal information where:

- You have entered into a contract with us
- It's necessary to protect someone in an emergency
- It's necessary for legal cases
- Its necessary for archiving, research or statistical purposes

How long is the data stored for?

We hold your personal data in line with the Parish Council's data retention policy and in compliance with the GDPR and DATA Protection Act 2018. In general, we will endeavour to keep data only for as long as we need it and will delete it when we no longer require it.

Who we share your personal information with?

Lenham Parish Council may be required to share your personal data with third parties, 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 personal data with some or all of the following organisations, but will only do so when necessary;

- Other local authorities
- Community groups
- Charities
- Other non profit entities
- Contractors

We do not share your personal data with anyone without your consent unless the law and the Parish Council policies allow us to do so.

Where we transfer personal data to a country or territory outside the European Economic Area we will do so in accordance with data protection law.

Your Rights

Your right of access

You have the right to ask us for copies of your personal information. This right always applies and is commonly known as making a 'subject access request'. There are some exemptions, which means you may not always receive all the information we process, for example, if information is likely to cause serious harm to the physical or mental health condition of you or any other person.

Information relating to or provided by third parties who has not consented to the disclosure including images removed or obscured may not be disclosed. If we can't give you some or any of the information, we will try and tell you why.

If you make a subject access request, and if we do hold information we will:

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you or your child
- Tell you who it has been, or will be shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form

To make a request for your personal information, please contact clerk@lenhamparishcouncil.org.uk clearly stating:

- Your name and contact details
- The information you want
- Any details or relevant dates that will help us to process your request

We may need to verify your identity for security reasons before we can exercise your rights.

You also have the right to:

- Object to processing your personal data in some circumstances
- Prevent processing for the purpose of direct marketing
- Object to decisions being taken by automated means
- In certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- Claim compensation for damages caused by a breach of the Data Protection Regulation

How we use cookies

A cookie is a small file which asks permission to be placed on your computer hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve the Parish Council website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookies in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

Further information on deleting and controlling cookies can be found at:

- www.aboutcookies.org
- www.allaboutcookies.org

Contact

If you have any questions about how your personal information is processed or to exercise any relevant rights, queries or complaints please contact:

The Clerk and Responsible Officer
Lenham Parish Council
1a High Street
Lenham
Kent ME17 2QD

Email clerk@lenhamparishcouncil.org.uk

Complaints

We take any complaints about the Parish Council collection and use of personal information very seriously.

If you think that the Parish Council collection or use of personal information is unfair misleading or inappropriate, or have any other concerns about Parish Council data processing, please raise this with the Parish Council Clerk and Responsible Officer in the first instance.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern on line
- Call 0303 123 1113

- Or write to:
- Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF



