

**PENTON GRAFTON PARISH COUNCIL
GENERAL PRIVACY NOTICE**

Adopted: __Sept 2026____

Review Date: __2027____

Version: 1.1 — updated in line with current NALC/HALC-style data protection guidance and UK GDPR good practice

1. INTRODUCTION

Penton Grafton Parish Council is committed to protecting and respecting personal information and to being transparent about how it collects, uses and shares personal data.

This General Privacy Notice explains how the Council processes personal data in accordance with the UK General Data Protection Regulation, the Data Protection Act 2018, the Privacy and Electronic Communications Regulations where relevant, and other applicable legislation.

The Council is the Data Controller for the personal data it processes. In some circumstances, the Council may work with other organisations as independent data controllers or, where purposes and means are jointly determined, as joint data controllers.

2. CONTACT DETAILS

If you have any questions regarding this Privacy Notice or wish to exercise your data protection rights, please contact:

The Clerk

Penton Grafton Parish Council

Email: _____clerk@pentongrafton-pc.gov.uk_____

Address: _____The Parish Council Office, The Fairground,
_____Weyhill, Andover, Hampshire SP11 0QN_____

3. THE INFORMATION WE COLLECT

The Council may collect and process personal data where necessary to carry out its functions, including:

- Name;
- Postal address;
- Email address;
- Telephone number;
- Correspondence sent to the Council;
- Information relating to complaints or enquiries;
- Information provided when participating in consultations;
- Information relating to grant applications;
- Information required for employment or contractual purposes.
- Photographs, video or audio recordings where relevant to Council business or events;
- Financial information such as bank details, payment references, invoices or grant records;

- Information about councillors, employees, volunteers, contractors, suppliers and applicants;
- Special category or criminal offence data only where lawful, necessary and subject to appropriate safeguards.

The Council will only collect personal data that is adequate, relevant and limited to what is necessary for specified, explicit and legitimate purposes.

Where special category data or criminal offence data is processed, the Council will identify an additional condition for processing and will handle that information with extra care.

4. HOW WE OBTAIN YOUR INFORMATION

Personal information may be obtained from:

- Information provided directly by you;
- Correspondence sent to the Council;
- Public authorities;
- Government agencies;
- Publicly available sources;
- Contractors acting on behalf of the Council.
- Other organisations where information sharing is lawful and necessary for Council functions;
- The Council's website, electronic systems or public meetings, where relevant.

5. WHY WE PROCESS YOUR INFORMATION

The Council processes personal information where it is necessary to:

- Carry out its statutory duties;
- Deliver local services;
- Respond to enquiries and correspondence;
- Manage consultations and community engagement;
- Administer grants and contracts;
- Manage employment matters;
- Maintain financial records;
- Comply with legal obligations;
- Investigate complaints.
- Meet transparency, accountability and governance requirements;
- Maintain records of Council decisions, assets, finances and public engagement.

6. LAWFUL BASIS FOR PROCESSING

The Council will identify and document an appropriate lawful basis before processing personal data. Depending on the circumstances, this may include:

Public Task

Processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority.

Legal Obligation

Processing necessary to comply with legal requirements.

Contract

Processing necessary for the performance of a contract.

Consent

Where consent is required, it will be freely given, specific, informed and unambiguous.

Consent may be withdrawn at any time.

Legitimate Interests

Where applicable and lawful, for example where the Council has a legitimate reason to process data and this is not overridden by the rights and freedoms of the individual.

The Council will not usually rely on legitimate interests when carrying out public tasks, but it may apply in limited circumstances such as employment, contractual or administrative matters.

7. HOW WE STORE YOUR INFORMATION

The Council takes appropriate technical and organisational measures to protect personal information from unauthorised access, alteration, disclosure, loss or misuse.

Information may be stored:

- Electronically;
- In paper files;
- In secure cloud-based systems used for Council business.

Security measures may include access controls, password protection, secure storage, appropriate sharing procedures, staff and councillor awareness, and secure disposal arrangements.

The Council expects anyone processing personal data on its behalf to provide appropriate assurances and to act only on documented instructions.

8. WHO WE MAY SHARE YOUR INFORMATION WITH

The Council may share personal information where lawful, necessary and proportionate, including with:

- Test Valley Borough Council
- Hampshire County Council
- Government departments;
- Regulatory bodies;
- External auditors;
- Professional advisers;
- Law enforcement agencies;
- Contractors working on behalf of the Council.

- Service providers and data processors supporting Council administration, finance, IT, website, payroll or legal functions;
- Other bodies where required for safeguarding, public safety, audit, insurance, legal claims or statutory reporting.

Information will only be shared where there is a lawful basis to do so. Where the Council uses data processors, it will seek appropriate contractual safeguards.

9. HOW LONG WE KEEP INFORMATION

The Council retains information only for as long as it is needed for the purposes for which it was collected, and in accordance with its Document Retention and Disposal Policy and legal, audit and operational requirements.

Retention periods vary depending on:

- Legal requirements;
- Operational needs;
- Audit requirements;
- The nature of the information.

Information is securely destroyed, deleted or archived when it is no longer required, subject to any legal obligation to retain it.

10. YOUR RIGHTS

Under data protection legislation, individuals have rights in relation to their personal data.

These may include the right to:

- Be informed about how your information is used;
- Access your personal information;
- Request correction of inaccurate information;
- Request erasure in certain circumstances;
- Restrict processing in certain circumstances;
- Object to processing;
- Request data portability where applicable;
- Challenge automated decision-making where applicable.

These rights are not absolute and may be subject to exemptions or limitations, depending on the lawful basis for processing and the circumstances of the request.

11. SUBJECT ACCESS REQUESTS

You may request access to personal information held about you. This is known as a Subject Access Request.

Requests should be submitted to the Clerk. The Council may ask for information to confirm your identity and to help locate the information requested.

The Council will normally respond within one calendar month. This period may be extended where a request is complex or where multiple requests have been made, in accordance with data protection legislation.

12. COOKIES AND WEBSITE DATA

The Council's website may use cookies and collect limited technical information to support website operation, security, accessibility, analytics or user preferences.

Where cookies or similar technologies are used, the Council will provide appropriate information and, where required, obtain consent in accordance with applicable legislation.

Further information may be provided through the Council website.

13. DATA BREACHES

The Council has procedures in place for identifying, managing and recording personal data breaches.

Where required by law, reportable breaches will be notified to the Information Commissioner's Office without undue delay and, where feasible, within 72 hours of the Council becoming aware of the breach. Affected individuals will be informed where required.

14. COMPLAINTS

If you are dissatisfied with how the Council has handled your personal information, you should first contact the Clerk.

If you remain dissatisfied, you may complain to:

Information Commissioner's Office (ICO)

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Telephone: [0303 123 1113](tel:03031231113)

Website: www.ico.org.uk

15. CHANGES TO THIS PRIVACY NOTICE

The Council may update this Privacy Notice from time to time to reflect changes in law, guidance, Council services or data processing activities.

The most recent version will be published on the Council website and should be reviewed at least annually or when there is a material change in processing activity.

APPROVAL

This Privacy Notice was approved by Penton Grafton Parish Council on:

Date: __ Sept 2026 _____

Minute Reference: __0926/7 _____

Chairman's Signature: __P Foster _____

Clerk's Signature: ____H Easton _____