

Salhouse Parish Council Website Privacy Statement

The Purpose of this privacy statement is to explain how Salhouse Parish Council, referred to as SPC, processes personal data to fulfil its data protection responsibilities. When needed, this statement will be supplemented by 'specific to client' privacy notices. The scope of this statement covers the activities of SPC's clerk and councillors.

The Role of SPC in data protection terms is that of a data controller where it determines the purpose and use of personal data collected. Once received it becomes the responsibility of the privacy manager (PM) to ensure that it is processed in accordance with UK's data protection legislation. The PM can be contacted using clerk.salhousepc@gmail.com.

The personal data processed by SPC will be basic contact information for the purposes of responding to general enquiries, conducting routine council business, preparing contracts and setting up invoices. If SPC is not given all of the requested information, it may result in an incomplete service being provided.

SPC's duty of confidentiality means that SPC will treat personal data with due respect and in confidence. SPC expects the same duty of confidentiality of all third parties with whom it shares personal data. It will only be disclosed when legal and ethical circumstances apply. When it is necessary to engage third-parties that require access to the personal data, for which SPC is responsible, a data processing agreement (or equivalent) for both parties will be put in place beforehand.

SPC will process your personal data in the UK, and it is backed up using one drive. Email is processed using a reputable web-based provider. Email and mobile phone contacts are stored on both office IT equipment and mobile phones, including those of the councillors. SPC uses reasonable organisational and technical measures to ensure personal data is kept secure, this includes councillors using SPC specific email accounts.

SPC will routinely process your personal data against a lawful basis as described below:

- When it is necessary for the performance of our tasks carried out in the public interest and in exercise of the official authority vested in SPC by UK legislation
- To fulfil its contractual obligations to including contract preparation
- When processing is necessary for the purposes of its legitimate interests
- To comply with its legal obligations
- When processing against a pre-defined purpose for which consent has been sought and recorded prior to that processing commencing,

In all cases the processing of personal data shall be done in accordance with the principles of data protection. Please note that consent, if granted to SPC, can be withdrawn at any time by asking the privacy manager.

SPC will share your personal data, only when it is necessary, with some or all of the following third parties:

- Broadland District Council
- Norfolk County Council
- The Inland Revenue (HMRC)
- Administrative support where personnel are bound by a data processing agreement

SPC follows a retention schedule to determine the length of time it holds different types of personal data. The retention schedule can be found on 'Documents' page on PC website www.salhouseparishcouncil.gov.uk along with the examples shown below:

- Routine correspondence for casual enquiries in hard copy or in emails will be stored for one year
- Contract related data will be retained throughout the life of the contract plus another 7 years following the conclusion of the treatment provided
- Contact data is stored indefinitely unless a valid request to erasure is received from the interested data subject
- Financial records and invoices, which may include personal data, will be retained for 6 years after the end of the current tax year of processing
- By exception, documentation that includes personal data may be retained by SPC beyond the schedule, but only for a specific purpose and only when SPC believes there is a legitimate interest or a legal obligation to do so

At the end of the retention schedule SPC will either return, destroy or delete your personal data and any associated emails or relevant documentation. If it is technically impractical to delete electronic copies of personal data, it will put it beyond operational use. It should be noted that SPC allows up to 3 months after the end of the retention schedule to complete the action.

The SPC website uses cookies but new visitors to the website are asked to consent to non-essential cookies before these are dropped. The website links to other relevant websites; if these are used, please note that SPC has no responsibility for the control, content or handling of visitors' personal data, by these websites.

The General Data Protection Regulation defines the rights although these do not apply in all situations. For convenience, these rights are shown below:

- **Right to be informed** as to how personal data is being processed – this is done through this statement or specific to client privacy notices
- **Right to access** personal data held by SPC which is done by submitting a 'Data Subject Access Request' (DSAR) to the privacy manager
- **Right to rectification** of personal data if SPC has collected it incorrectly or it needs to be updated
- **Right to erasure** of personal data for which SPC no longer has a legitimate purpose to process
- **Right to restrict processing** under certain circumstances, during which time personal data but will be out of operational use until the related matter is resolved
- **Right to data portability** of personal data in a machine-readable version, but this only applies to data provided with consent or under contract
- **Right to object** to processing personal data for which SPC does not have a legal or contractual obligation
- **Rights related to automated decision making and profiling**, however SPC does not use these techniques in its decision making

Further details on data subject rights can be found on the Information Commissioner's Office (ICO) website: <https://ico.org.uk>.

Raising concerns, exercising rights or making queries about our processing of personal data can be done by contacting the privacy manager. Please be aware that SPC will need to verify a requesters/enquirer's identity before responding fully. For that reason, SPC may ask for proof of ID or other material that, in context, enables SPC to confirm the necessary identity. Alternatively, the ICO may be contacted directly, using the details provided above.