

## St Paul Malmesbury Without Parish Council

### Data Protection Policy

Adopted 23<sup>rd</sup> May 2018

#### Introduction

This policy explains the types of personal data that St Paul Malmesbury Without Parish Council (the Council) may collect, and how we store and use that data in order to comply with the principles of the General Data Protection Regulations (GDPR).

#### The legal bases we rely on to process information

There are 3 main bases.

If members of the public ask us for information, or to resolve an issue, they are giving their consent for the Council to store and use their contact details for that purpose.

If the Council enters into a contract we will collect data through contractual necessity.

A Parish Council is defined as a Public Authority, and as such may also use public interest as the basis for processing data; that is that we need to do so in order to carry out our functions.

Under any of these legal bases, the Council should only collect, store and use as much personal information as is necessary to achieve that.

#### Whose data do we collect?

- Elected representatives and holders of public office
- Suppliers
- Parties to legal agreements
- Residents of the parish
- Advisors and consultants

#### When do we collect personal data?

The Council collects personal data when you:

- Enter into a contract with the Council to provide services where your business and home details are the same
- Enter into a legal agreement with the Council
- Correspond from another council where your Council and home details are the same
- Agree to have contact details included in key Council documents, eg, the Emergency Plan
- Act as a specialist advisor to the Council, eg, around nature reserves
- As a member of the public, correspond with the Council.

### **What personal data do we collect?**

In most instances the Council collects and holds only names, email and/or postal address and phone number.

For contractors and advisors we may hold and use other information, particularly financial.

### **What is personal data used for?**

- The personal data of some contractors and advisors is used to enable services to be provided to the Council on behalf of Parish residents.
- The personal data of staff and councillors from other councils is used to enable this Council to carry out its role.
- The personal data of members of the public is used to enable us to address concerns and queries raised by them.

### **How long do we hold your personal information?**

We will only keep it for as long as is necessary for the purpose for which it was collected; for example, until a concern raised by a member of the public has been resolved.

### **Who else has access to the information you provide us?**

We will not share your data with any third parties, except where required to do so by law or where essential to carry out our functions. For example, if a member of the public raises a highways concern with the Parish Council, it might be necessary to share some information with Wiltshire County Council to progress resolution. Another example; if Emergency Plan contact details need to be shared with the Emergency Services. Only the minimum necessary personal information would be shared on a strict need to know basis.

### **How do we protect your personal data?**

We have implemented generally accepted standards of technology and security in order to protect your personal data. Information may be held on paper, or in an electronic form by the Parish Clerk, or by council members. Councillors and the Clerk have clear procedures for collecting storing and using data securely. Electronic information is password protected. We will notify you promptly in the event of discovering any breach of your personal data which might expose you to serious risk.

## **What are my rights?**

You have the right to:

- Access your personal data
- Be provided with information about how your personal data is processed
- Have your personal data corrected when incorrect
- Withdraw consent for us to use your personal data
- Have your personal data deleted in certain circumstances
- Object to or restrict how your personal data is processed
- Have your personal data transferred to another organization in certain circumstances

To exercise any of these rights, or to ask any questions please contact us by emailing the Data Protection Officer:  
[clerk@stpaulmalmesburywithoutparishcouncil.org.uk](mailto:clerk@stpaulmalmesburywithoutparishcouncil.org.uk)

You have the right to take any complaints about how we process your personal data to the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF, or by visiting their website at [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns)

We keep this Data Protection Policy under regular review and we will place any updates on the website  
[stpaulmalmesburywithoutparishcouncil.org.uk](http://stpaulmalmesburywithoutparishcouncil.org.uk)

Reviewed: November 2020

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