

Our Privacy Policy

Effective date: March 2022

Whether you visit our website or correspond with one of our councillors or our clerk, you are trusting us with your information. This policy sets out how we collect, use and respect such information, and how the law protects you and your information.

Why this policy exists

This privacy policy explains how we collect and process your information. All references to **information** in this policy, means any data which identifies a natural person or which allows that person to be identified when combined with other data.

This privacy policy is provided in accordance with our obligations under applicable privacy and data protection law, including the UK retained version of Regulation (EU) 2016/679 (GDPR) and the Data Protection Act 2018.

We keep our privacy policy under regular review. The version of the policy became effective on the date shown above.

What information we have & how it was collected

We collect and use information to act as your parish council and to operate our website, as well as to provide updates about Nuffield and engage you to perform services for the Parish Council. In this context, we are a **data controller**.

What information we have

We have set out below the information we may collect, use, store and transfer:

- **Contact data** including email address and telephone numbers.
- **Identity data** including your name, username, marital status, title.
- **Financial data** including bank account, billing address and payment details.
- **Transaction data** including details about payments made and other details of services supplied.
- **Usage Data** including information about your visit to our website.
- **Employment or background data** includes current and past employment, experience, qualifications, skills, interests and any other information disclosed by you if you are applying to work with the Parish Council or be a councillor.

How we collect your information

We use different methods to collect data including through:

- **Information you provide to us directly.** You may give us details such as a name, email address and other contact details in person or by corresponding with us by post, phone, email or otherwise. This includes information provided when you:
 - contact us via our website;
 - participate in an event which we have attended or organised;
 - request our assistance;
 - are engaged by us to perform services for the Parish Council;
 - meet with, contact or engage with our councillors or clerk;
 - subscribe to our newsletters, or request any other information to be sent to you;
 - contact us about a role with us;
 - respond to a survey, make a complaint or give us some feedback.
- **Third parties and publicly available sources.** We may receive personal data from various third parties as set out below:
 - identity and contact data from other individuals you have been corresponding with; and
 - information given to us by other people in local government.

How we use cookies

Our website uses cookies and similar technologies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and allows us to improve our website. You can set your browser to refuse all or some browser cookies.

Why we collect and use your information

We will only collect and use information when the law allows us to. Most commonly, we will use your information so we can provide you with information about the Parish Council and activities in Nuffield and to respond to queries raised by you.

See below for further details

The table below set out the ways we use information and our legal basis for doing so. Most commonly, we will use your information:

- where we need to perform the contract we are about to enter into or have entered into with you;
- where it is in our legitimate interest to do so (or those of a third party) and it is proportionate to do so;
- where we need to comply with a legal obligation.

Purpose/Activity	Type of data	Lawful basis for processing (including basis of legitimate interest)
To add you to our newsletter distribution list and email Nuffield news to you	(a) Identity (b) Contact	(a) Necessary for our legitimate interest (providing parish council services)
To respond to questions and deal with parish related queries.	(a) Identity (b) Contact	(a) Necessary for our legitimate interests
To manage our relationship with you, which may include: (a) Instructing you to perform services for us (b) Paying you to perform services for us	(a) Identity (b) Contact (c) Financial	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests
To administer our website and email	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (b) Necessary to comply with a legal obligation
To process a job or councillor application	(a) Identity (b) Contact (c) Financial	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation

Where we need to collect information by law, or under the terms of a contract and you do not provide that information when requested, we may not be able to perform the contract or engage you to provide services.

Change of purpose

We will only use your information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, contact us.

Please note that we may process your information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Who we share your information with & why

We may share your information with others, particularly those that help us provide parish council services. Most commonly, this includes other people in local government and IT service providers.

We require others to respect the information we share with them, and to only use it in ways the law allows. We only allow others to use such information for the specific purposes we set out, and not for any other purposes.

See below for further details

We may have to share information with third parties (including those below) for the purposes and activities explained above:

- Our colleagues in local government who we engage to assist with parish matters.
- Service providers who perform services and functions on our behalf in connection with the operation of the council such as software and application service providers and third parties who host, store and manage data or provide programming or technical support, etc.
- Professional advisers including our accountants, insurers and brokers, etc.
- If we are required to do so by law, or if we believe that such action is necessary to: (a) fulfil a government, or regulatory authority request; (b) conform with the requirements of the law or legal process; (c) protect or defend our legal rights or property.

We will share information, without notice, only if we are required to do so by law or we, in the good faith, believe that such action is necessary to:

- comply with legislation or any legal process served on us;
- protect and defend our rights and/or property; and
- to protect personal safety.

We do not sell or give your information to third parties for them to contact or market their goods or services to you without your consent.

International transfers

We don't send your data outside of the UK.

How we protect your information

We take steps to keep your information secure and we delete it when we no longer need it.

See below for further details

Security of your personal data

We have put in place appropriate security measures to prevent information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to information to those of our councillors and other third parties who have a business need to know. They will only process information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Data retention

We will retain information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for information, we consider the amount, nature, and sensitivity of the information, the potential risk of harm from unauthorised use or disclosure of the information, the purposes for which we process the information and whether we can achieve those purposes through other means, and the applicable legal requirements.

We regularly review the information we hold, taking into account the lawful purpose for which we hold it, and any data that is deemed no-longer relevant or required is deleted where it is practicable to do so.

Your rights

Privacy laws give you certain rights. For example, you can choose whether to receive marketing from us and you can ask us what information we have about you.

You have the right to:

- **Request access.** This means you can ask us to give you a copy of the information we hold about you.
- **Request correction.** This means if we have incomplete or inaccurate information, you can ask us to correct it. It is important that the information we hold about you is accurate and current. Please keep us informed if the information you provide us changes as our relationship evolves. Note, we may need to verify the accuracy of the new data you provide to us.

- **Request erasure.** This means you can ask us to delete or remove any information we have if there is no good reason for us continuing to have it. You also have the right to ask us to delete or remove information where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your information to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing.** This means you can contact us if you feel our use of your information impacts on your rights and freedoms. This applies if we are: (a) relying on our legitimate interest (or those of a third party) to use your information or (b) if you believe we are using your information unlawfully. It is unlikely, but in some cases we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction.** This means you can ask us to suspend using your information in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the information is unlawful but you do not want us to erase it; (c) where you need us to hold the information even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your information but we need to verify whether we have overriding legitimate grounds to use it.
- **Request transfer.** This means you can ask us to transfer the information we hold on you to you, or to a third party. We will provide to you, or the third party you have chosen, your information in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use, or where we used the information to perform a contract with you.
- **Withdraw consent.** This means you can tell us that you no longer consent to our use of your information at any time where we are relying on consent to process your information. If you withdraw your consent, we may not be able to provide certain services or content to you. We will advise you if this is the case at the time you withdraw your consent. Note that this will only apply to any information where we were previously relying on consent as the legal basis to use your information. This action will also not affect the lawfulness of any processing carried out before you withdraw your consent

What we may need from you

We may need to request specific information from you to help us confirm your identity and your rights in relation to your request. This is a security measure to ensure that information is not disclosed to any person who does not have a right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

No fee usually required

You will not have to pay a fee to exercise the rights listed above. However, we may charge a reasonable fee if your request is unfounded, repetitive, or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

Nuffield Parish Council

Time limit to respond

We try to respond to all legitimate requests as soon as reasonably practicable and at least within one month. Occasionally it may take us longer if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Right to complain to the Information Commissioner's Office

You have the right to make a complaint at any time to the Information Commissioner's Office (**ICO**), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

How to contact us

If you have any questions or would like to contact us about this policy, you can contact us by email at admin@nuffieldparish.org