

Billingshurst Parish Council

Privacy Notice

Billingshurst Parish Council understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

1. Information About us

Billingshurst Parish Council
Billingshurst Centre
Roman Way
Billingshurst
West Sussex
RH14 9QW

Phone: 01403 782555

Email: council@billingshurst.gov.uk

2. What Does This Notice Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

3. What Is Personal Data?

Personal data is defined by the UK GDPR and the Data Protection Act 2018 (collectively, “the Data Protection Legislation”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

4. What Are My Rights?

4.1. Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

4.1.a. The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you

need to know, but you can always contact us to find out more or to ask any questions using the details in Part 11.

- 4.1.b. The right to access the personal data we hold about you. Part 10 will tell you how to do this.
 - 4.1.c. The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 11 to find out more.
 - 4.1.d. The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 11 to find out more.
 - 4.1.e. The right to restrict (i.e. prevent) the processing of your personal data.
 - 4.1.f. The right to object to us using your personal data for a particular purpose or purposes.
 - 4.1.g. The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
 - 4.1.h. The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
 - 4.1.i. Rights relating to automated decision-making and profiling. we do not use your personal data in this way.
- 4.2. For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 11.
 - 4.3. It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data
 - 4.4. Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.
 - 4.5. If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. we would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in Part 11.

5. What Personal Data Do You Collect and How?

5.1. We may collect and hold some or all of the personal and non-personal data set out in the table below, using the methods also set out in the table.

| Data Collected | How we Collect the Data |
|---|--|
| Your image | Direct from you |
| Identity information for example your name | Direct from you |
| Contact details for example your address, phone number, email address or social media names | Direct from you |
| Financial information such as your bank details | Direct from you |
| DBS Records or records of criminal offence data | Direct from you or shared with us by: <ul style="list-style-type: none"> • A DBS checking service |
| Councillors register of interests, for example any disclosable pecuniary interests, and any other of personal interests which the council has determined should be registered. | Direct from you (if you are a councilor) |
| Special Category Data which is: <ul style="list-style-type: none"> • personal data revealing racial or ethnic origin; • personal data revealing political opinions; • personal data revealing religious or philosophical beliefs; • personal data revealing trade union membership; • genetic data; • biometric data (where used for identification purposes); • data concerning health; • data concerning a person's sex life; and • data concerning a person's sexual orientation. | Direct from you |

6. How Do You Use My Personal Data?

6.1. Under the Data Protection Legislation, we must always have a lawful basis for using personal data. The following table describes how we will use your personal data, and our lawful bases for doing so:

| What we Do | What Data we Use | Lawful Basis |
|-----------------------------------|--|------------------|
| Maintaining the councils accounts | <ul style="list-style-type: none"> • Identity information • Contact details • Financial information | Legal obligation |

| | | |
|--|--|--|
| CCTV in the community centre | <ul style="list-style-type: none"> Your image | Legitimate interest |
| Contract tenders and administration of contracts | <ul style="list-style-type: none"> Identity information Contact details Financial information | Contract |
| The council's human resources | <ul style="list-style-type: none"> Identity information Contact details Financial information Special category data | Contract |
| The council's payroll and pensions | <ul style="list-style-type: none"> Identity information Contact details Financial information Special category data | Legal obligation |
| Administration of community centre | <ul style="list-style-type: none"> Identity information Contact details Financial information | Contract |
| e-newsletter | <ul style="list-style-type: none"> Identity information Contact details | Consent |
| Photographs of groups for publicity | <ul style="list-style-type: none"> Your image Special category data | Legitimate interest |
| Photographs of small number of Individuals | <ul style="list-style-type: none"> Your image Special category data | Consent |
| Running Surveys | <ul style="list-style-type: none"> Identity information Contact details Special category data | Consent |
| Administration of volunteering programs | <ul style="list-style-type: none"> Identity information Contact details DBS Records Special category data Criminal offence data | Consent |
| Recordings of meetings | <ul style="list-style-type: none"> Identity information Image | Legal Obligation |
| Correspondence with the council | <ul style="list-style-type: none"> Identity information Contact information | Legal obligation, public interest task |
| Records about our Councillors | <ul style="list-style-type: none"> Identity information Contact details Register of interests Criminal offence data Special category data | Legal obligation |
| Record keeping and function of council meetings, minutes and agendas, committee papers etc | <ul style="list-style-type: none"> Identity information Contact details Image | Legal Obligation |

6.2. With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email with information or news about our activities and services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the Data Protection

Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

- 6.3. We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 11.
- 6.4. If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.
- 6.5. In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

7. How Long Will You Keep My Personal Data?

- 7.1. We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

| Purpose of Keeping Your Data | How Long we Keep It |
|--|---|
| Maintaining the council's accounts | 6 Years from relevant transaction |
| CCTV in the community centre | 30 days |
| Contract tenders and administration of contracts | 6 Years from relevant transaction |
| The council's human resources | 6 Years from employment end |
| The council's payroll and pensions | 6 Years from employment end |
| Administration of community centre | 6 Years from relevant transaction |
| e-newsletter | 1 Year from last contact |
| Photographs of groups for publicity | Indefinite |
| Photographs of small number of Individuals | Indefinite |
| Running Surveys | 1 Year from survey end |
| Administration of volunteering programs | 6 Years from end |
| Recordings of meetings | Until the next meeting of the same committee or council |
| Correspondence with the council | 1 Year from last contact |
| Records about our Councillors | For length of council term |
| Record keeping and function of council meetings, minutes and agendas, committee papers etc | Indefinite |

8. How and Where Do You Store or Transfer My Personal Data?

- 8.1. We will store some of your personal data in the UK. This means that it will be fully protected under the Data Protection Legislation.

- 8.2. We will store some of your personal data within the European Economic Area (the “EEA”). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the EU GDPR and/or to equivalent standards by law. Transfers of personal data to the EEA from the UK are permitted without additional safeguards.
- 8.3. We may store some of your personal data in countries outside of the UK. These are known as “third countries”. we will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation as follows:
 - 8.3.a. We will store or transfer personal data in or to countries that are deemed to provide an adequate level of protection for personal data. For further information about adequacy decisions and adequacy regulations, please refer to the Information Commissioner’s Office.
 - 8.3.b. We will use specific approved contracts which ensure the same levels of personal data protection that apply under the Data Protection Legislation. For further information, please refer to the Information Commissioner’s Office.
- 8.4. Please contact us using the details below in Part 11 for further information about the particular data protection safeguards used by us when transferring your personal data to a third country.
- 8.5. The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:
 - 8.5.a. limiting access to your personal data to those council members, employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
 - 8.5.b. procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner’s Office where we are legally required to do so;

9. **Do You Share My Personal Data?**

- 9.1. If we merge all or part of our council or any of its business or assets, your personal data may be transferred to a third party. Any new authority may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Notice.
- 9.2. In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal

proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

- 9.3. We may sometimes need to share your data with the following third parties to enable us to fulfil our obligations.

| Recipient | Activity Carried Out | Sector | Location |
|--|---|-------------------------------|----------|
| Insurance company | Insurance | Financial services | UK |
| DBS | Running voluntary services and giving help to vulnerable people | Public authority / Government | UK |
| HMRC | Payroll | Public authority / Government | UK |
| Pension provider | Pensions | Financial services | UK |
| Press and Social Media | Publicity | Media | UK |
| Law enforcement or similar competent authority | Law enforcement | Law enforcement | UK |

- 9.4. If any of your personal data is shared with a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Part 8.

- 9.5. If any personal data is transferred outside of the UK, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation, as explained above in Part 8.

10. How Can I Access My Personal Data?

- 10.1. If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".
- 10.2. All subject access requests should ideally be made in writing and sent to the email or postal addresses shown in Part 11.
- 10.3. There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.
- 10.4. We will respond to your subject access request within one month of receiving it. Normally, we aim to provide a complete response, including a copy of your

personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

11. How Do I Contact You?

- 11.1. To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

Billingshurst Parish Council
Billingshurst Centre
Roman Way
Billingshurst
West Sussex
RH14 9QW

Phone: 01403 782555
Email: council@billingshurst.gov.uk

12. Changes to this Privacy Notice

- 12.1. We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.
- 12.2. Any changes will be made available on the Parish Website and at the Parish Council offices at the above address.
- 12.3. This Privacy Notice was last updated in April 2022.