



## **Data Protection and Privacy Policy**

Bletchley and Fenny Stratford Town Council is registered with the ICO

Registration Number: ZA088495

Data Controller: Bletchley and Fenny Stratford Town Council

Version No: V 2	Date adopted: 5 November 2019	Review due: May 2020
-----------------	-------------------------------	----------------------

## **Your personal data – what is it?**

“Personal data” is any information about a living individual which allows them to be identified from that data (for example a name, photographs, videos, email address, or address). Identification can be by the personal data alone or in conjunction with any other personal data. The processing of personal data is governed by legislation relating to personal data which applies in the United Kingdom including the Data Protection Act 2018, the General Data Protection Regulation (the “GDPR”) and other local legislation relating to personal data and rights such as the Human Rights Act.

## **Council information**

This Privacy Policy is provided to you by Bletchley & Fenny Stratford Town Council which is the data controller for your data. Our website is at [www.bletchleyfennystratford-tc.gov.uk](http://www.bletchleyfennystratford-tc.gov.uk) and our main address is Bletchley & Fenny Stratford Town Council, Bletchley Library, Westfield Road, Bletchley, Milton Keynes MK2 2RA.

## **Other data controllers**

We also work with other data controllers such as

- Milton Keynes Council and other local authorities
- Community groups
- Charities
- Other not for profit entities
- Contractors
- Credit reference agencies

## **The Council will process some or all of the following personal data where necessary to perform its tasks**

- Names, titles, and aliases, photographs;
- Contact details such as telephone numbers, addresses, and email addresses;
- Where they are relevant to the services provided by a council, or where you provide them to us, we may process demographic information such as gender, age, marital status, nationality, education/work histories, academic/professional qualifications, hobbies, family composition, and dependants;
- Where you pay for activities such as use of a council hall, financial identifiers such as bank account numbers, payment card numbers, payment/transaction identifiers, policy numbers, and claim numbers;
- The data we process may include sensitive personal data or other special categories of data such as racial or ethnic origin, mental and physical health, details of injuries, medication/treatment received, political beliefs, trade union affiliation, genetic data, biometric data, data concerning sex life or sexual orientation.
- With our website provider we collect and use data from our website for example using cookies and the way we do this is described in our Website Privacy Statement which is attached to this policy at Appendix I.
- Personal data in the form of images recorded by CCTV cameras from security systems at Town Council premises<sup>1</sup>

## **The council will comply with data protection law. This says that the personal data we hold about you must be:**

- Used lawfully, fairly and in a transparent way.

---

<sup>1</sup> A separate CCTV policy provides more detailed information about the use of CCTV cameras and can be found on the Town Council’s website

- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept and destroyed securely including ensuring that appropriate technical and security measures are in place to protect your personal data from loss, misuse, unauthorised access and disclosure.

**We use your personal data for some or all of the following purposes:**

- To deliver public services including to understand your needs to provide the services that you request and to understand what we can do for you and inform you of other relevant services;
- To confirm your identity to provide some services;
- To contact you by post, email, telephone or using social media (e.g., Facebook, Twitter);
- To help us to build up a picture of how we are performing;
- To prevent and detect fraud and corruption in the use of public funds and where necessary for law enforcement functions;
- To enable us to meet all legal and statutory obligations and powers including any delegated functions;
- To carry out comprehensive safeguarding procedures (including due diligence and complaints handling) in accordance with best safeguarding practice from time to time with the aim of ensuring that all children and adults-at-risk are provided with safe environments and generally as necessary to protect individuals from harm or injury;
- To promote the interests of the council;
- To maintain our own accounts and records;
- To seek your views, opinions or comments;
- To notify you of changes to our facilities, services, events and staff, councillors and role holders;
- To send you communications which you have requested and that may be of interest to you. These may include information about campaigns, appeals, other new projects or initiatives;
- To process relevant financial transactions including grants and payments for goods and services supplied to the council including hire of premises
- To allow the statistical analysis of data so we can plan the provision of services.

Our processing may also include the use of CCTV systems for the prevention and prosecution of crime.

**What is the legal basis for processing your personal data?**

The council is a public authority and has certain powers and duties. Most of your personal data is processed for compliance with a legal obligation which includes the discharge of the council's statutory functions and powers. Sometimes when exercising these powers or duties it is necessary to process personal data of residents or people using the council's services. We will always take into account your interests and rights. This Privacy Policy sets out your rights and the council's obligations to you in detail.

We may also process personal data if it is necessary for the performance of a contract with you, or to take steps to enter into a contract. An example of this would be processing your data in connection with the hire of our premises, or the acceptance of an allotment garden tenancy. Sometimes the use of your personal data requires your consent. We will first obtain your consent to that use.

## Sharing your personal data

The council will implement appropriate security measures to protect your personal data. This section of the Privacy Policy provides information about the third parties with whom the council will share your personal data. These third parties also have an obligation to put in place appropriate security measures and will be responsible to you directly for the manner in which they process and protect your personal data. It is likely that we will need to share your data with some or all of the following (but only where necessary):

- Our agents, suppliers and contractors. For example, we may ask a commercial provider to publish or distribute newsletters on our behalf, or to maintain our database software;
- On occasion, other local authorities or not for profit bodies with which we are carrying out joint ventures eg in relation to facilities or events for the community.

## How long do we keep your personal data?

We will keep some records permanently if we are legally required to do so. We may keep some other records for an extended period of time. For example, it is current best practice to keep financial records for a minimum period of 8 years to support HMRC audits or provide tax information. We may have legal obligations to retain some data in connection with our statutory obligations as a public authority. The council is permitted to retain data in order to defend or pursue claims. In some cases, the law imposes a time limit for such claims (for example 3 years for personal injury claims or 6 years for contract claims). We will retain some personal data for this purpose as long as we believe it is necessary to be able to defend or pursue a claim. In general, we will endeavour to keep data only for as long as we need it. This means that we will delete it when it is no longer needed. The council has a detailed document retention policy which is available on request.

## Your rights and your personal data

You have the following rights with respect to your personal data:

When exercising any of the rights listed below, in order to process your request, we may need to verify your identity for your security. In such cases we will need you to respond with proof of your identity before you can exercise these rights.

- (i) The right to access personal data we hold on you*
- (ii) The right to correct and update the personal data we hold on you*
- (iii) The right to have your personal data erased*
- (iv) The right to object to processing of your personal data or to restrict it to certain purposes only*
- (v) The right to data portability*
- (vi) The right to withdraw your consent to the processing at any time for any processing of data to which consent was obtained*
- (vii) The right to lodge a complaint with the Information Commissioner's Office.* You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

## Transfer of Data Abroad

Any personal data transferred to countries or territories outside the European Economic Area ("EEA") will only be placed on systems complying with measures giving equivalent protection of personal rights either through international agreements or contracts approved by the European Union. Our website is also accessible from overseas so on occasion some personal data (for example in a newsletter) may be accessed from overseas.

## Further processing

If we wish to use your personal data for a new purpose, not covered by this Privacy Policy, then we will provide you with a Privacy Notice explaining this new use prior to commencing the processing

and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

### **Changes to this policy**

We keep this Privacy Policy under regular review and we will place any updates on this page of our website

[https://www.bletchleyfennystratford-tc.gov.uk/Policies\\_and\\_Governance\\_8286.aspx](https://www.bletchleyfennystratford-tc.gov.uk/Policies_and_Governance_8286.aspx) This policy was last updated in November 2019

### **Responsibility for implementing this policy**

The Town Council as a corporate body has ultimate responsibility for ensuring compliance with the Data Protection legislation. The Council has delegated the day to day implementation of the policy to the Town Clerk.

### **Contact Details**

Please contact us if you have any questions about this Privacy Policy or the personal data we hold about you or to exercise all relevant rights, queries or complaints.

- Email: [clerk@bletchleyfennystratford-tc.gov.uk](mailto:clerk@bletchleyfennystratford-tc.gov.uk)
- Phone: 01908 649469
- Correspondence: The Town Clerk, Bletchley and Fenny Stratford Town Council, Bletchley Library, Westfield Road, Bletchley, Milton Keynes MK2 2RA

Adopted by Council: 5 November 2019 (Minute reference: FC19/20 - 195 )

Review Date: Annual Meeting May 2020

## **VISION ICT Website Privacy Statement**

**Last updated: March 2019**

This page informs you of our policies regarding the collection, use and disclosure of Personal Information we receive from users of the Site. We use your Personal Information only for providing and improving the Site. By using the Site, you consent and agree to the collection and use of information in accordance with this policy.

### **Information Collection and Use**

While using our Site, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you. Personally, identifiable information may include, but is not limited to your name (“Personal Information”). We may also run surveys from time to-time, using third party websites such as Survey Monkey. We strive to anonymise the data we collect, and only use it for the improvement of the services we offer.

### **Log Data**

Like many site operators, we collect information that your browser sends whenever you visit our Site (“Log Data”). This Log Data may include information such as your computer’s Internet Protocol (“IP”) address, browser type, browser version, the pages of our Site that you visit, the time and date of your visit, the time spent on those pages and other statistics. In addition, we may use third party services such as Google Analytics that collect, monitor and analyse this data. This data is completely anonymised and does not include personal information such as name or email address.

### **How long will we keep your data?**

We hold the data securely in line with our document retention and management procedure. We keep all data for as long as

- a) the project its collected for is in operation
- b) on an ongoing basis but normally deleted after 10 years if our association with you is not active.

### **Communications**

We may use your Personal Information to contact you with newsletters, should you opt into receive them.

### **Cookies**

Cookies are files with small amount of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a web site and stored on your computer’s hard drive. Like many sites, we use “cookies” to collect information. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Site. Please see our Cookie Statement for more information.

### **Security**

The security of your Personal Information is important to us but remember that no method of transmission over the Internet, or method of electronic storage, is 100% secure. While we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security.

### **Changes to this Privacy Policy**

This Privacy Policy is effective as of March 2018 and will remain in effect except with respect to any changes in its provisions in the future, which will be in effect immediately after being posted on this page.

We reserve the right to update or change our Privacy Policy at any time and you should check this Privacy Policy periodically. Your continued use of the Service after we post any modifications to the Privacy Policy

on this page will constitute your acknowledgement of the modifications and your consent to abide and be bound by the modified Privacy Policy. We reserve the right to update or change our Privacy Policy at any time and you should check this Privacy Policy periodically. Your continued use of the Service after we post any modifications to the Privacy Policy on this page will constitute your acknowledgement of the modifications and your consent to abide and be bound by the modified Privacy Policy.