



GENERAL PRIVACY POLICY

Cleobury Mortimer Town Council is committed to protecting your privacy and handling your personal information which we hold in a fair, lawful and transparent way. This policy explains how we collect, use, store and protect personal information. 'Personal data' is any information about a living individual, which allows them to be identified from that data.

Cleobury Mortimer Town Council is a data controller and processes personal data. We comply with all laws concerning the protection of personal information, including the UK General Data Protection Regulation (GDPR), the Data Protection Act 2018 and the Privacy and Electronic Communications Regulations (PECR). We have security measures in place to reduce the risk of theft, loss, misuse, or inappropriate disclosure of personal information. All our systems have unique login details and access is only given to the staff and councillors who need it.

Whenever you provide personal information, we will treat that information in accordance with this Privacy Policy. The information we collect may be obtained through our website, social media, by phone, correspondence or given in person. Cleobury Mortimer Town Council will also process personal data whenever you access or sign up to any of our services, request information, make a complaint or participate in activities provided by us.

The personal data we collect is necessary to carry out our duties and responsibilities. This information may include such things as:

- Names, titles, aliases and photographs
- Contact details such as telephone numbers, addresses and email addresses
- Gender, age, marital status, nationality, education, work history, academic/professional qualifications, hobbies, family composition and dependants - where they are relevant to the service provided by, or the contract held with the Council.
- Financial details – where you pay for activities or Council services
- Images of people captured by CCTV

We may also process sensitive or special category personal information that may include:

- Racial or ethnic origin
- Political opinion
- Religious, philosophical or other beliefs
- Physical/medical conditions or mental health details
- Trade Union membership

Other data controllers we work with who we may need to share information with so that they can carry out their responsibilities to the Council:

- Business associates, professional advisers
- Family, associates and representatives of the person whose personal data we are processing
- Suppliers and service providers
- Local and Central Government
- Financial organisations
- Police and emergency services
- Ombudsman and regulatory authorities
- Credit reference and debt collection agencies
- Healthcare professionals, social and welfare organisations
- Current, past or prospective employers
- Examining bodies
- Charities and Community Groups



Reasons for processing of personal information may include:

- Processing financial transactions and managing financial services
- Maintaining our accounts and records
- Supporting and managing our employees
- Promoting our website and the services we provide
- Responding to your enquiries and corresponding with you
- Carrying out health and public awareness campaigns
- Managing our property and delivering public services
- Carrying out surveys and undertaking research
- Crime prevention including the use of CCTV
- Corporate administration and all activities we are required to carry out as a data controller and a public authority
- Managing archive records for historical and research reasons
- Planning matters including applications and decisions; local plans and conservation

Consent

We will ask you for your permission to process your personal information if it is not covered by public task or legal duty. This might be when we want to use your information in a way that is different to the original purpose where there is no legal basis. If we rely on your consent to process your personal information you have the right to withdraw that consent at any time. Your consent must be freely given, specific, informed and unambiguous.

We will need the parental consent for children under the age of 13 years to hold their personal data. We will make reasonable efforts to verify age and parental responsibility.

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 new notice explaining this new use prior to commencing the processing; setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

How long do we keep your personal data?

Our Retention Policy provides a detailed breakdown of how long we will retain your personal data and can be found on our website. A copy of any of the Council's policies will be provided upon request.

Your rights and your personal data

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

- **The right to be informed** - Individuals have the right to be informed about the collection and use of their personal data. A person can access our policies so that they can understand their rights.
- **The right to access** – Individuals have the right to access and receive a copy of their personal data, and other supplementary information. A person can ask for a copy of personal information held about them (this is known as a subject access request (SAR)). When such a request is made the Council may need clarification of the required information. A notification will be sent to the requester detailing any clarification required. The person will also be required to produce identification, a list of documents required will be on the notification. The Council has one calendar month to respond to the subject access request, starting from the date the identification condition has been satisfied. This period can be extended by a further two months but only in exceptional circumstances. If there is any delay the person making the request will be informed and an explanation will be given. Please be aware that any data held containing third party personal data or that which may identify a third person, depending upon its content, will be considered by the Council for suitability for release. Any decision to withhold such information will be recorded. The notification form also contains an option for your preference of the format you wish to receive your personal data in.
- **The right to rectification** – The UK GDPR includes a right for individuals to have inaccurate personal data rectified, or completed if it is incomplete.



- **The right to erasure** – The UK GDPR introduces a right for individuals to have personal data erased. A person can ask for the deletion or removal of personal data unless there is a legal requirement for retention. If that is the case the Council will inform them and refer them to the Retention Policy.
- **The right to restrict processing** – Individuals have the right to request the restriction or suppression of their personal data. If there is a legal requirement for retention, the Council will inform the person and refer them to the Retention Policy.
- **The right of data portability** – The right to data portability allows individuals to obtain and reuse their personal data for their own purposes across different services. A person may request their information such as for moving suppliers.
- **The right to object** – The UK GDPR gives individuals the right to object to the processing of their personal data in certain circumstances, such as for direct marketing, on the basis of legitimate interests or for scientific/historical research and statistics.
- **Rights related to automated decision making/profiling** – The UK GDPR has provisions on automated individual decision-making and profiling. A person can ask for human intervention in an automated process.

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.

Transfer of Data Abroad

Most of your personal data will be stored in the UK. However, some personal data may be stored or processed in other countries. Any personal data transferred to countries or territories outside the UK will only be placed on systems complying with measures giving equivalent protection of personal rights either through international agreements or on the basis allowed for under UK GDPR. Our website is also accessible from overseas so on occasion some personal data may be accessed from overseas.

Contact Details

Please contact us if you have any questions about this Privacy Policy, the personal data we hold about you or to exercise relevant rights, queries or complaints at: Cleobury Mortimer Town Council, Office 3, The Market Hall, Church Street, Cleobury Mortimer, DY14 8BX.

Email: council@cleobury.org.uk
Telephone: 01299 271154

Further Information

Further information and advice regarding data protection can be found by contacting 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.

Review of the General Privacy Policy

The effectiveness of this General Privacy Policy and associated arrangements will be reviewed every two years unless changes in legislation or proper practices require an earlier review.

Review Date: June 2028.