

## Ongar Town Council Privacy Notice

### Contact Details

The Town Council is the controller for the personal information we process. Our postal address:  
Ongar Town Council  
Bansons  
Bansons Way  
Essex  
CM5 9AS  
Telephone 01277 365348

Our Data Protection Manager is the Locum Town Clerk, Michael Letch. You can contact him at [clerk@ongartowncouncil.gov.uk](mailto:clerk@ongartowncouncil.gov.uk) or via the postal address and telephone number above.

### What is personal data?

“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 directly using the data itself or by combining it with other information which helps to identify a living individual. The processing of personal data is governed by legislation relating to personal data which applies in the United Kingdom including the General Data Protection Regulation (the “GDPR”) and other legislation relating to personal data and rights such as the Human Rights Act.

### How is personal data processed?

This privacy notice tells you what to expect us to do with your personal information when you make contact with us or use one of our services. We will tell you:

- why we are able to process your information
- what purpose we are processing it for
- whether you have to provide it to us
- how long we store it for
- whether there are other recipients of your personal information

We do not transfer information to another country, and we do not do automated decision-making, data combining or profiling. The Town Council website does not use cookies and does not use web analytic tools. Where we provide links to websites of other organisations, this privacy notice does not cover how that organisation processes personal information. We encourage you to read the privacy notices on the other websites you visit. The Town Council has no control over the processing of personal details given in social media posts. You are advised to read the privacy notice of the social media platform before publishing any personal details.

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 information such as gender, age, marital status, nationality, education

and work history, academic and professional qualifications, hobbies, family composition, and dependants;

- Where you pay for activities such as the allotments, cemetery, or use of Basons Hall, financial identifiers such as bank account numbers, payment card numbers, payment and transaction identifiers, policy numbers, and claim numbers;

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.
- 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 to protect 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.
- 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 the 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 other 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
- To allow the statistical analysis of data so we can plan the provision of services.
- The use of CCTV images for the prevention and detection of crime.

### **Sensitive personal data**

It may be necessary for the Town Council to process sensitive or other special categories of personal data such as criminal convictions, racial or ethnic origin, mental and physical health, details of injuries, medication and treatment received, political beliefs, trade union affiliation, genetic data, biometric

data, data concerning and sexual life or orientation. These types of data are described in the GDPR as “Special categories of data” and require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal data.

In limited circumstances, we may approach you for your written consent to allow us to process certain sensitive personal data. If we do so, we will provide you with full details of the personal data that we would like and the reason we need it, so that you can carefully consider whether you wish to consent.

We may process this type of personal data where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else’s interests) and you are not capable of giving your consent, or where you have already made the information public.

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

The council is a public authority and has certain powers and obligations. 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 Notice sets out your rights and the council’s obligations to you.

We may process personal data if it is necessary for the performance of a contract with you, or to take steps to enter into a contract. For example, where we process your data in connection with the use of sports facilities, hall hires or the acceptance of an allotment garden tenancy.

If your consent is required, we will obtain it before processing the data.

### **Sharing your personal data**

Where it is necessary to provide the service you require, the Town Council may need to share your personal data with a third party. These third parties 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 may need to share your data with some or all of the following, but only where necessary:

- Other data controllers, such as local authorities or not for profit bodies who provide services outside the control of the Town Council or with whom we are carrying out joint ventures e.g. in relation to facilities or events for the community.
- Community groups
- Charities
- Our agents, suppliers and contractors.

### **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 currently 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. Normal correspondence will be deleted three years after the last time of access.

### **The right to access personal data we hold on you**

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.

- At any point you can contact us to request the personal data we hold on you as well as why we have that personal data, who has access to the personal data and where we obtained the personal data from. Once we have received your request we will respond within one month. There are no fees or charges for the first request but additional requests for the same personal data or requests which are manifestly unfounded or excessive may be subject to an administrative fee.
- The right to correct and update the personal data we hold on you. If the data we hold on you is out of date, incomplete or incorrect, you can inform us and your data will be updated.
- The right to have your personal data erased. If you feel that we should no longer be using your personal data or that we are unlawfully using your personal data, you can request that we erase the personal data we hold. When we receive your request we will confirm whether the personal data has been deleted or the reason why it cannot be deleted (for example because we need it for to comply with a legal obligation).
- The right to object to processing of your personal data or to restrict it to certain purposes only. You have the right to request that we stop processing your personal data or ask us to restrict processing. Upon receiving the request we will contact you and let you know if we are able to comply or if we have a legal obligation to continue to process your data. °The right to data portability
- You have the right to request that we transfer some of your data to another controller. We will comply with your request, where it is feasible to do so, within one month of receiving your request. The right to withdraw your consent to the processing at any time for any processing of data to which consent was obtained
- You can withdraw your consent easily by telephone, email, or by post (see Contact Details above).
- The right to lodge a complaint with the Information Commissioner's Office.

You can contact the Information Commissioners Office by post at  
Wycliffe House,  
Water Lane,  
Wilmslow,  
Cheshire  
SK9 5AF.  
Or telephone 0303 123 1113  
Or email <https://ico.org.uk/global/contact-us/email/>

**Further processing**

If we wish to use your personal data for a new purpose, not covered by this Privacy Notice, then we will provide you with a new 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 notice**

We keep this Privacy Notice under regular review and we will place any updates on our web page .This Notice was last updated in May 2018.