

SWAFFHAM PRIOR PARISH COUNCIL

PRIVACY NOTICE

Introduction.

Swaffham Prior Parish Council are committed to keeping your personal data safe and secure. This Privacy Notice sets out how the Council collect, use, store and protect your personal data and also sets out clear information about your rights in relation to your personal data.

Your personal data — what is it?

“Personal data” is any information about a living individual which allows them to be identified from that data. Obvious examples are a name, photograph or email address, less obvious examples include online identifies, location information or ID numbers.

The processing of personal data is governed by legislation relating to personal data which applies in the United Kingdom including the UK GDPR and the Data Protection Act 2018, collectively “the Data Protection Legislation”.

Who are we?

This Privacy Notice is provided to you by Swaffham Prior Parish Council, which is the data controller for your data.

The Council may need to share the personal data we hold with other data controllers so that they can carry out their responsibilities to the Council. If we and the other data controllers are processing your data jointly for the same purposes, then the Council and the other data controllers may be “joint data controllers” which mean we are all collectively responsible to you for your data. Where each of the parties is processing your data for their own independent purposes, then each of us will be independently responsible to you, and if you have any questions, wish to exercise any of your rights (see below) or wish to raise a complaint, you should do so directly to the relevant data controller.

A description of what personal data the Council processes and for what purposes is set out in this Privacy Notice.

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

- Identity Data — Including name, username or similar identifier, marital status, title, date of birth, gender and photographs or video recordings.
- Contact Data — Including address, email address and telephone numbers.
- Financial Data — Including bank account and payment card details.
- Transaction Data — Including details about payments to and from the Data Subject and other details of goods and services the Data Subject has purchased.
- Technical Data — Including internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices the Data Subject uses to access our website.
- Profile Data — Including purchases or orders made by the Data Subject, the Data Subject’s feedback and survey responses.
- Usage Data — Including information about how the Data Subject uses our website, goods and services.

- Marketing and Communications Data — Including the Data Subject’s communication preferences.
- Employment Data — Including details included in contracts of employment and academic/professional qualifications.

The personal data we process may include sensitive or other special category data such as racial/ethnic origin, political opinions, trade union membership, sexual orientation and data concerning health.

How we use sensitive personal data

We may process sensitive personal data, including, as appropriate:

- In order to comply with legal requirements and obligations to third parties.

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.

We may process special categories of personal data in the following circumstances:

- In limited circumstances, with your explicit written consent.
- Where we need to carry out our legal obligations.
- Where it is needed in the public interest.

Less commonly, 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.

Do we need your consent to process your sensitive 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.

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 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.

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- 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.
- 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 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 events, campaigns, appeals, other new projects or initiatives.
- To process relevant financial transactions including grants and payments for goods and services supplied to or by the Council.
- To allow the statistical analysis of data so we can plan the provision of services.

What is the legal basis for processing your personal data?

The Council processes personal data, which is necessary for the performance of a contract to which you may be a party or may want to enter for example, renting of an allotment plot.

The Council processes personal data which is necessary to comply with its legal obligations, for example, providing personal information to regulators and statutory bodies.

The Council processes personal data in order to meet its legitimate interests as a parish council. For example, responding to general enquiries, supporting parishioners and improving our services.

Sometimes the use of your personal data requires your consent. We will first obtain your consent to that use.

Sharing your personal data

This section provides information about the third parties with whom the Council may share your personal data. 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 will need to share your data with some or all of the following (but only where necessary):

- Other data controllers that the Council is working with (as described above).
- Suppliers and contractors. For example, a funeral director or we may ask a commercial provider to maintain our website or manage our IT services.
- On occasion, other local authorities or not-for-profit bodies with which we are carrying out joint ventures.

How long do we keep your personal data?

We will keep some records permanently, for example minutes from our meetings. 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. 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.

Your rights and 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.

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

- The right to access personal data we hold on you.
 - 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.

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- 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 contacting us at the details shown below.
- The right to lodge a complaint with the Information Commissioner's Office.
 - You can contact the Information Commissioner's Office on 0303 123 1113 or via [email](#) at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

Sharing information outside the UK

Where necessary, we may transfer personal information outside of the UK. When doing so, we comply with the UK GDPR, making sure appropriate safeguards are in place. Please contact us for more information.

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.

Security

Data security is of great importance to the Council and to protect your data we have put in place suitable physical, electronic and managerial procedures to safeguard and secure your collected data.

We take security measures to protect your information, including:

- Using appropriate procedures and technical security measures (including encryption) to safeguard your information across our computer system, website and office.

Contact.

If you require any further information please contact the Parish Council via the Clerk at swaffhampriorclerk@gmail.com