Thurnham Parish Council

Information and Data Protection Policy

1. Introduction

In order to conduct its business, services and duties, Thurnham Parish Council processes a wide range of data, relating to its own operations and some which it handles on behalf of partners. In broad terms, this data can be classified as:

- Data shared in the public arena about the services it offers, its mode of operations and other information it is required to make available to the public.
- Confidential information and data not yet in the public arena such as ideas or policies that are being worked up.
- Confidential information about other organisations because of commercial sensitivity.
- Personal data concerning its current, past, and potential employees, Councillors, and volunteers.
- Personal data concerning individuals who contact it for information, to access its services or facilities or to make a complaint.

Thurnham Parish Council will adopt procedures and manage responsibly, all data which it handles and will respect the confidentiality of both its own data and that belonging to partner organisations it works with and members of the public. In some cases, it will have contractual obligations towards confidential data, but in addition will have specific legal responsibilities for personal and sensitive information under data protection legislation.

This Policy is linked to our Document Retention Policy which will ensure information considerations are central to the ethos of the organisation.

The Parish Council will periodically review and revise this policy in the light of experience, comments from data subjects and guidance from the Information Commissioners Office.

The Council will be as transparent as possible about its operations and will work closely with public, community and voluntary organisations. Therefore, in the case of all information which is not personal or confidential, it will be prepared to make it available to partners and members of the Parish communities. Details of information which is routinely available is contained in the Council's Publication Scheme which is based on the statutory model publication scheme for local councils.

2. Protecting Confidential or Sensitive Information

Thurnham Parish Council recognises it must at times, keep and process sensitive and personal information about both employees and the public, it has therefore adopted this policy not only to meet its legal obligations, but to ensure high standards.

The General Data Protection Regulation (GDPR) which become law on 25th May 2018 and will like the Data Protection Act 1998 before them, seek to strike a balance between the rights of individuals and the sometimes, competing interests of those such as the Parish Council with legitimate reasons for using personal information.

The policy is based on the premise that Personal Data must be:

- Processed fairly, lawfully and in a transparent manner in relation to the data subject.

- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- Adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed.
- Accurate and, where necessary, kept up to date.
- Kept in a form that permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.
- Processed in a manner that ensures appropriate security of the personal data including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organisational measures.

Data Protection Terminology

Data subject - means the person whose personal data is being processed.
That may be an employee, prospective employee, associate or prospective associate of WPC or someone transacting with it in some way, or an employee, Councillor, or volunteer with one of our clients, or persons transacting or contracting with one of our clients when we process data for them.

Personal data - means any information relating to a natural person or data subject that can be used directly or indirectly to identify the person.
It can be anything from a name, a photo, and an address, date of birth, an email address, bank details, and posts on social networking sites or a computer IP address.

Sensitive personal data - includes information about racial or ethnic origin, political opinions, and religious or other beliefs, trade union membership, medical information, sexual orientation, genetic and biometric data, or information related to offences or alleged offences where it is used to uniquely identify an individual.

Data controller - means a person who (either alone or jointly or in common with other persons) (e.g., Parish Council, employer, council) determines the purposes for which and the manner in which any personal data is to be processed.

Data processor - in relation to personal data, means any person (other than an employee of the data controller) who processes the data on behalf of the data controller.

Processing information or data - means obtaining, recording, or holding the information or data or carrying out any operation or set of operations on the information or data, including:

- organising, adapting, or altering it.
- retrieving, consulting, or using the information or data.
- disclosing the information or data by transmission, dissemination or otherwise making it available.
- aligning, combining, blocking, erasing, or destroying the information or data regardless of the technology used.
- Thurnham Parish Council processes personal data in order to:
- fulfil its duties as an employer by complying with the terms of contracts of employment, safeguarding the employee and maintaining information required by law.
- pursue the legitimate interests of its business and its duties as a public body, by fulfilling contractual terms with other organisations, and maintaining information required by law.
- monitor its activities including the equality and diversity of its activities.
- fulfil its duties in operating the business premises including security.
- assist regulatory and law enforcement agencies.
- process information including the recording and updating details about its Councillors, employees, partners, and volunteers.

- process information including the recording and updating details about individuals who contact it for information, or to access a service, or make a complaint.
- undertake surveys, censuses, and questionnaires to fulfil the objectives and purposes of the Council.
- undertake research, audit, and quality improvement work to fulfil its objects and purposes.
- carry out Council administration.

Where appropriate and governed by necessary safeguards we will carry out the above processing jointly with other appropriate bodies from time to time.

The Council will ensure that at least one of the following conditions is met for personal information to be considered fairly processed:

- The individual has consented to the processing
- Processing is necessary for the performance of a contract or agreement with the individual
- Processing is required under a legal obligation
- Processing is necessary to protect the vital interests of the individual
- Processing is necessary to carry out public functions
- Processing is necessary in order to pursue the legitimate interests of the data controller or third parties.

Particular attention is paid to the processing of any sensitive personal information and the Parish Council will ensure that at least one of the following conditions is met:

- Explicit consent of the individual
- Required by law to process the data for employment purposes
- A requirement in order to protect the vital interests of the individual or another person

Who is responsible for protecting a person's personal data?

The Parish Council as a corporate body has ultimate responsibility for ensuring compliance with the Data Protection legislation. The Council has delegated this responsibility day to day to the Parish Clerk.

- Email: clerk@Thurnhamparishcouncil.gov.uk
- Phone: 01634867173
- Correspondence: The Parish Clerk, 4 Birkhall Close, Walderslade, Chatham, Kent, ME57QD

3. Diversity Monitoring

Thurnham Parish Council monitors the diversity of its employees, and Councillors, in order to ensure that there is no inappropriate or unlawful discrimination in the way it conducts its activities. It undertakes similar data handling in respect of prospective employees. This data will always be treated as confidential. It will only be accessed by authorised individuals within the Council and will not be disclosed to any other bodies or individuals. Diversity information will never be used as selection criteria and will not be made available to others involved in the recruitment process. Anonymised data derived from diversity monitoring will be used for monitoring purposes and may be published and passed to other bodies.

The Council will always give guidance on personnel data to employees, Councillors, partners, and volunteers through a Privacy Notice and ensure that individuals whose personal information is kept are aware of their rights and have easy access to that information on request.

Appropriate technical and organisational measures will be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.

Personal data shall not be transferred to a country or territory outside the European Economic Areas unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

4. Information provided to us

The information provided (personal information such as name, address, email address, phone number) will be processed and stored so that it is possible for us to contact, respond to or conduct the transaction requested by the individual. By transacting with Thurnham Parish Council, individuals are deemed to be giving consent for their personal data provided to be used and transferred in accordance with this policy, however wherever possible specific written consent will be sought. It is the responsibility of those individuals to ensure that the Parish Council is able to keep their personal data accurate and up to date. The personal information will be not shared or provided to any other third party or be used for any purpose other than that for which it was provided.

5. The Council's Right to Process Information

General Data Protection Regulations (and Data Protection Act) Article 6 (1) (a) (b) (c) and (e)
Processing is with consent of the data subject, or

Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract.
Processing is necessary for compliance with a legal obligation.
Processing is necessary for the legitimate interests of the
Council.

6. Information Security

The Parish Council takes care to ensure the security of personal data. We make sure that your information is protected from unauthorised access, loss, manipulation, falsification, destruction, or unauthorised disclosure. This is done through appropriate technical measures and appropriate policies.

We will only keep your data for the purpose it was collected for and only for as long as is necessary, after which it will be deleted.

7. Children

We will not process any data relating to a child (under 13) without the express parental/ guardian consent of the child concerned.

8. Rights of a Data Subject

Access to Information: an individual has the right to request access to the information that we hold about them. They can do this by contacting the Parish Clerk.
Information Correction: If they believe that the information, we hold about them is incorrect, they may contact us so that we can update it and keep their data accurate. Please contact the Parish Clerk.
Information Deletion: If the individual wishes the Parish Council to delete the information held about them, they can do so by contacting the Parish Clerk.

Right to Object: If an individual believes their data is not being processed for the purpose it has been collected for, they may object by contacting the Parish Clerk.

The Parish Council does not use automated decision making or profiling of individual personal data.

Complaints: If an individual has a complaint regarding the way their personal data has been processed, they may make a complaint to the Parish Clerk, or the Information Commissioners Office casework@ico.org.uk Tel: 0303 123 1113.

The Council will always give guidance on personnel data to employees through the Privacy Notice for Staff, Councillors and Role Holders (see Appendix 3).

The Council will ensure that individuals on whom personal information is kept are aware of their rights and have easy access to that information on request. This is achieved through the Council's Privacy Notice (General). (See Appendix 1)

9. Making Information Available

The Publication Scheme is a means by which the Council can make a significant amount of information available routinely, without waiting for someone to specifically request it. The scheme is intended to encourage local people to take an interest in the work of the Council and its role within the community.
In accordance with the provisions of the Freedom of Information Act 2000, this Scheme specifies the classes of information which the Council publishes or intends to publish.

All formal meetings of Council and its committees are subject to statutory notice being given on notice boards, the Website and sent to the local media. All formal meetings are open to the public and press and reports to those meetings and relevant background papers are available for the public to see. The Council welcomes public participation and has a public participation session on each Council meeting. Details can be seen in the Council's Standing Orders, which are available on its website.

Occasionally, Council may need to consider matters in private. Examples of this are matters involving personal details of staff, or a particular member of the public, or where details of commercial/contractual sensitivity are to be discussed. This will only happen after a formal resolution has been passed to exclude the press and public and reasons for the decision are stated. Minutes from all formal meetings, including the confidential parts are public documents.

The Openness of Local Government Bodies Regulations 2014 requires written records to be made of certain decisions taken by officers under delegated powers. These are not routine operational and administrative decisions such as giving instructions to the workforce or paying an invoice approved by Council but would include urgent action taken after consultation with the Chairman, such as responding to a planning application in advance of Council. In other words, decisions which would have been made by Council had the delegation not been in place.

The 2014 Regulations also amend the Public Bodies (Admission to Meetings) Act 1960 to allow the public or press to film, photograph, or make an audio recording of council and committee meetings normally open to the public. The Council will where possible facilitate such recording unless it is being disruptive. It will also take steps to ensure that children, the vulnerable and members of the public who object to being filmed are protected without undermining the broader purpose of the meeting.

10. Disclosure Information

The Council will as necessary undertake checks on both staff and Councillors with the Disclosure and Barring Service and will comply with their Code of Conduct relating to the secure storage,

handling, use, retention and disposal of Disclosures and Disclosure Information.

11. Data Transparency

Government has also issued a further Code of Recommended Practice on Transparency, compliance of which is compulsory for Parish Councils with turnover (gross income or gross expenditure) not exceeding £25,000 per annum. These councils will be exempt from the requirement to have an external audit from April 2017. Thurnham Parish Council exceeds this turnover but will nevertheless ensure the following information is published on its website for ease of access:

- End of year accounts
- Annual Governance Statements
- Internal Audit Reports
- Details of public land and building assets
- Agendas no later than three clear days before the meeting.

Appendix 1

Thurnham Parish Council Privacy Notice (General)

When you contact Thurnham Parish Council, hereafter called "The Council"
The information you provide (personal information such as name, address, email address, phone number) will be processed and stored so that it is possible to contact you and respond to your correspondence, advise, provide information, send invoices and receipts relating to service provision.

Your personal information will not be shared with any third party without your prior consent.

The Council – Right to Process Information GDPR
Article 6 (1) (a) (b) and (e)

Processing is with consent of the data subject or
Processing is necessary for compliance with a legal obligation or
Processing is necessary for the legitimate interests of the Council.

Information Security

The Council has a duty of care to ensure the security of personal data. We make sure that your information is protected from unauthorised access, loss, manipulation, falsification, destruction, or unauthorised disclosure. This is done through appropriate technical measures and relevant policies.

We will only keep your data for the purpose it was collected for and only for as long as is necessary (as specified in our Document Retention Policy), after which it will be deleted or shredded.

Your Rights

Access to Information
You have the right to request access to the information that we hold about you. You can do this by contacting us by email or post. You will be required to provide proof of identity.

Information Correction
If you believe that the information, we hold about you is incorrect, you may contact us so that we can update it and keep your data accurate.

Information Deletion
If you require the Council to delete the information that we hold about you, please contact us.

Right to Object
If you believe that your data is not being processed for the purpose it has been collected for, you may object, please contact us.

Rights Related to Automated Decision Making and Profiling
The Council does not use automated decision making or profiling of personal data.

To Sum Up

In accordance with the law, we only collect a limited amount of information about you that is necessary for correspondence, information, and service provision. We do not use profiling; we do not sell or pass your data to third parties. We do not use your data for purposes other than those specified. We make sure your data is stored securely. We delete all information deemed to be no longer necessary in line with our Document Retention Policy. We constantly review our Information and Data Protection Policy to keep it up to date in protecting your data.

Contact Details

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

The Parish Clerk
Thurnham Parish Council
4 Birkhall Close
Walderslade
Chatham
Kent
ME57QD

Email: clerk@Thurnhamparishcouncil.gov.uk

Tel: 01634867173

You can contact the Information Commissioners Office at:
casework@ico.org.uk
Tel: 0303 123 1113.

Appendix 2

Thurnham Parish Council

Parish Clerk: Mrs Sherrie Babington
4, Birkhall Close, Walderslade,
Chatham, Kent, ME5 7QD
Telephone: 01634 867173
Email: clerk@Thurnhamparishcouncil.gov.uk

General Data Protection Regulations

Thurnham Parish Council - Consent to hold Contact Information form

I agree that I have read and understand Thurnham Parish Council's Privacy Statement.

I agree by signing below that the Council may process my personal information for corresponding with me and providing services and will not share my personal information with third parties.

I agree that Thurnham Parish Council can keep my contact information data for an undisclosed time or until I request its removal.

I have the right to request modification of the information that you keep on record.

I have the right to withdraw my consent and request that my details are removed from your database.

Name:

Email Address:

Address:

Signature:

Date:
Office use: (Issue to allotment holders)

Date Data received	Date consent received and approved for data to be held	Date removal of consent received	Date data disposed of, and method of disposal actioned

Appendix 3

Thurnham Parish Council

Parish Clerk: Mrs Sherrie Babington
4, Birkhall Close, Walderslade,
Chatham, Kent, ME5 7QD
Telephone: 01634 867173
Email: clerk@Thurnhamparishcouncil.gov.uk

Thurnham Parish Council Privacy Notice (for Staff*, Councillors and Role Holders**)

* "Staff" means employees, workers, agency staff and those retained on a temporary or permanent basis

** Includes, volunteers, contractors, agents, and other role holders within the council including former staff*and former councillors. This also includes applicants or candidates for any of these roles.

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, photograph, video, 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 (e.g., a list of staff may contain personnel ID numbers rather than names but if you use a list a separate list of the ID numbers which give the corresponding names to identify the staff in the first list then the first list will also be treated as personal data). 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.

Who are we?

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

The council works together with:

- Other data controllers, such as local authorities, public authorities, central government, and agencies such as HMRC and DVLA
- Staff pension providers
- Former and prospective employers
- DBS services suppliers
- Payroll services providers
- Recruitment Agencies
- Banks

We may need to share personal data we hold with them so that they can carry out their responsibilities to the council and our community. The organisations referred to above will sometimes be "joint data controllers". This means we are all responsible to you for how we process your data where for example two or more data controllers are working together for a joint purpose.

If there is no joint purpose or collaboration, then the data controllers will be independent and will be individually responsible to you.

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.

What data do we process?

- Names, titles, and aliases, photographs.
- Start date / leaving date.
- Contact details such as telephone numbers, addresses, and email addresses.
- Where they are relevant to our legal obligations, or where you provide them to us, we may process information such as gender, age, date of birth, marital status, nationality, education/work history, academic/professional qualifications, employment details, hobbies, family composition, and dependents.
- Non-financial identifiers such as passport numbers, driving licence numbers, vehicle registration numbers, taxpayer identification numbers, staff identification numbers, tax reference codes, and national insurance numbers.
- Financial identifiers such as bank account numbers, payment card numbers, payment/transaction identifiers, policy numbers, and claim numbers.
- Financial information such as National Insurance number, pay and pay records, tax code, tax and benefits contributions, expenses claimed.
- Other operational personal data created, obtained, or otherwise processed in the course of carrying out our activities, including but not limited to, CCTV footage, recordings of telephone conversations, IP addresses and website visit histories, logs of visitors, and logs of accidents, injuries, and insurance claims.
- Next of kin and emergency contact information
- Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process and referral source (e.g., agency, staff referral))
- Location of employment or workplace.
- Other staff data (not covered above) including; level, performance management information, languages, and proficiency; licenses/certificates, immigration status; employment status; information for disciplinary and grievance proceedings; and personal biographies.
- Information about your use of our information and communications systems.

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

Please note: We need all the categories of personal data in the list above primarily to allow us to perform our contract with you and to enable us to comply with legal obligations.

- Making a decision about your recruitment or appointment.
- Determining the terms on which you work for us.
- Checking you are legally entitled to work in the UK.
- Paying you and, if you are an employee, deducting tax and National Insurance contributions.
- Providing any contractual benefits to you
- Liaising with your pension provider.

- Administering the contract, we have entered into with you.
- Management and planning, including accounting and auditing.
- Conducting performance reviews, managing performance, and determining performance requirements.
- Making decisions about salary reviews and compensation.
- Assessing qualifications for a particular job or task, including decisions about promotions.
- Conducting grievance or disciplinary proceedings.
- Making decisions about your continued employment or engagement.
- Making arrangements for the termination of our working relationship.
- Education, training, and development requirements.
- Dealing with legal disputes involving you, including accidents at work.
- Ascertaining your fitness to work.
- Managing sickness absence.
- Complying with health and safety obligations.
- To prevent fraud.
- To monitor your use of our information and communication systems to ensure compliance with our IT policies.
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.
- To conduct data analytics studies to review and better understand employee retention and attrition rates.
- Equal opportunities monitoring.
- To undertake activity consistent with our statutory functions and powers including any delegated functions.
- To maintain our own accounts and records;
- To seek your views or comments;
- To process a job application;
- To administer Councillors' interests
- To provide a reference.

Our processing may also include the use of CCTV systems for monitoring purposes.
Some of the grounds for processing will overlap and there may be several grounds which justify our use of your personal data.
We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract, we have entered into with you.
- Where we need to comply with a legal obligation.

We may also use your personal data in the following situations, which are likely to be rare:

- Where we need to protect your interests (or someone else's interests).
- Where it is needed in the public interest [or for official purposes].

How we use sensitive personal data

- We may process sensitive personal data relating to staff, councillors and role holders including, as appropriate:
  - information about your physical or mental health or condition in order to monitor sick leave and take decisions on your fitness for work;
  - your racial or ethnic origin or religious or similar information in order to monitor compliance with equal opportunities legislation;
  - 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, such as for equal opportunities monitoring or in relation to our pension scheme.
  - Where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards.

- 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?

- We do not need your consent if we use your sensitive personal data in accordance with our rights and obligations in the field of employment and social security law.
- 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.
- You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

Information about criminal convictions

- We may only use personal data relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided, we do so in line with our Information and Data Protection Policy.
- Less commonly, we may use personal data relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary 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.
- Where appropriate, we will collect personal data about criminal convictions as part of the recruitment process or we may be notified of such personal data directly by you in the course of you working for us.

What is the legal basis for processing your personal data?

Some of our processing is necessary for compliance with a legal obligation.
We may also process data if it is necessary for the performance of a contract with you, or to take steps to enter into a contract.

We will also process your data in order to assist you in fulfilling your role in the council including administrative support or if processing is necessary for compliance with a legal obligation.
Sharing your personal data

Your personal data will only be shared with third parties including other data controllers where it is necessary for the performance of the data controllers' tasks or where you first give us your prior consent. It is likely that we will need to share your data with

- Our agents, suppliers, and contractors. For example, we may ask a commercial provider to manage our HR/ payroll functions , or to maintain our database software;

- Other persons or organisations operating within the local community.

- Other data controllers, such as local authorities, public authorities, central government, and agencies such as HMRC and DVLA

- Staff pension providers
- Former and prospective employers
- DBS services suppliers
- Payroll services providers
- Recruitment Agencies
- Credit reference agencies
- Professional advisors
- Trade unions or employee representatives
- Banks

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. This means that we will delete it when it is no longer needed.
Please note that information belonging to unsuccessful applicants for Staff or Councillor positions, will normally be kept for six months.
For more information, please refer to the Council's Document Retention Policy.

Your responsibilities

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your working relationship with us.

Your rights in connection with 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.

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 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 below).

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.

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, if we start to use your personal data for a purpose not mentioned in this notice.

Changes to this notice

We keep this Privacy Notice under regular review, and we will place any updates on our website.

Contact Details

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

The Parish Clerk
Thurnham Parish Council
4 Birkhall Close
Chatham
Kent
ME57QD

Email: clerk@Thurnhamparishcouncil.gov.uk

Tel: 01634867173

Appendix 4

Thurnham Parish Council

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4, Birkhall Close, Walderslade,
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Telephone: 01634 867173
Email: clerk@Thurnhamparishcouncil.gov.uk

General Data Protection Regulations
Thurnham Parish Council - Consent to hold Contact Information (Staff, Councillors and Role Holders)

I agree that I have read and understand Thurnham Parish Council's PRIVACY NOTICE for staff, Councillors and Role Holders.

I agree by signing below that the Council may process my personal information for the purposes described in the Privacy Notice.

I have the following rights with respect to my 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 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 below).
- 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.

Name:

Email Address:

Address:

Signature:

Date:

For office use: (Issue to job applicants, employees, Councillors elected/ Co-opted)

Date Data received	Date consent received and approved for data to be held	Date removal of consent received	Date data disposed of, and method of disposal actioned