



## **SHERBURN IN ELMET TOWN COUNCIL PRIVACY POLICY**

This Privacy Policy is provided to you by Sherburn Town Council which is the data controller for your data.

### **Our Contact Details:**

Sherburn in Elmet Town Council  
Eversley Park Centre  
Low Street  
Sherburn in Elmet  
LS25 6BA  
01977 681024  
[clerk@sherburninemet-tc.gov.uk](mailto:clerk@sherburninemet-tc.gov.uk)

### **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 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 (GDPR) and other legislation relating to personal data and rights such as the Human Rights Act.

### **To comply with data protection law, the personal data we hold about you will 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.



## **The type of personal data we collect.**

We currently collect and process the following information:

- Personal identifiers, contacts, and characteristics (for example, name and contact details)
- CCTV images and photographs.
- Online identifiers, including your IP address and cookie identifiers.
- Employee data.
- Financial identifiers such as bank account numbers, payment card numbers, payment/transaction identifiers.

## **How we get personal information and why we have it.**

Most of the personal information we process is provided to us directly by you using one of the following methods:

- Verbal communication.
- Written communication.
- Email.
- Website enquiry

We also receive personal information indirectly, from the following sources in the following scenarios:

- CCTV 24 hour recording system in numerous locations around the town.
- Photographs at events and activities.
- Website activity.

## **We may use the personal data to:**

- Deliver public services including understanding 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.
- Confirm your identity to provide some services.
- Contact you by post, email, telephone or using social media (e.g., Facebook, Twitter, WhatsApp).
- Help us to build up a picture of how we are performing.



- Prevent and detect fraud and corruption in the use of public funds and where necessary for the law enforcement functions.
- Enable us to meet all legal and statutory obligations and powers including any delegated functions.
- Carry out comprehensive safeguarding procedures.
- Promote the interests of the council.
- Maintain our own accounts and records.
- Seek your views, opinions, or comments.
- Notify you of changes to our facilities, services, events and staff, councillors, and other role holders.
- Send you communications which you have requested and that may be of interest to you.
- Process relevant financial transactions including grants and payments for goods and services supplied to the council.
- Allow the statistical analysis of data so that we can plan the provision of services.
- Deal with enquiries and complaints.
- Assist with Website administration.
- Enter into contractual agreements.
- Assist with crime prevention and prosecution of crime.
- Assist with security purposes.
- Process employment and volunteering applications.
- Improve our services.

### **Sensitive personal data.**

Sensitive personal data (Special categories of personal data) 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.



## **Lawful Basis.**

Under the UK General Data Protection Regulation (UK GDPR), the lawful basis we rely on for processing this information is:

- We have a legitimate interest.
- We need it to perform a public task.

## **Sharing your personal data.**

We may need to share your personal data we hold with the following organisations, to enable them to carry out their responsibilities to the council or if we have a legal reason to do so:

- Other data controllers, such as local authorities.
- Our agents, suppliers and contractors. For example, we may ask a commercial provider to publish or distribute newsletters on our behalf, to collect responses to a consultation or to maintain our database software.
- Credit reference agencies.
- Other not for profit entities.

Where personal data relating to criminal allegations or offences is processed, this will be carried out only where authorised under UK law in compliance with GDPR Article 10 and will meet one or more of the following conditions set out Schedule 1, Part 3 of the Data Protection Act 2018:

- Sch 1 para 33: Legal Claims
- Sch 1 para 36: Substantial Public Interest
- Sch 1 para 37: Insurance Claims

There is no planned regular or scheduled sharing of CCTV footage with any external organisation. However, in the event of a security incident or suspected security incident, footage may be shared with third-party organisations such as the police or insurance companies.

## **How we will store your personal information and how long for.**

We will store all the personal information you provide on our secure, password and firewall protected computer or servers. All our files and hard drives are backed up regularly. We will take reasonable technical and organisational precautions to prevent the loss, alteration misuse, unauthorised access, and disclosure of your personal information. We 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.

- 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 if we believe it is necessary to be able to defend or pursue a claim.
- CCTV recordings are kept in a secure location and retained for 28 days.

## **Your data protection rights.**

Under data protection law, you have rights including:

- **Your right of access** – You have the right to ask us for copies of your personal information.
- **The right to rectification** – You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Your right to erasure** – You have the right to ask us to erase your personal information in certain circumstances.
- **Your right to restriction of processing** – You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- **Your right to object to processing** – You have the right to object to the processing of your personal information in certain circumstances.
- **Your right to data portability** – You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

When exercising any of the rights listed above, 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.



## Changes to this Policy.

We keep this Privacy Policy under regular review, and we will place any updates on our website [www.sherburninemet-tc.gov.uk](http://www.sherburninemet-tc.gov.uk)

## How to Complain.

If you have any concerns about our use of your personal information, you can make a complaint to us at:

Sherburn in Elmet Town Council  
Eversley Park Centre  
Low Street  
Sherburn in Elmet  
LS25 6BA

01977 681024

[clerk@sherburninemet-tc.gov.uk](mailto:clerk@sherburninemet-tc.gov.uk)

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wimslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>