

# LEIGHTON BROMSWOLD PARISH COUNCIL

Chairman: Bohdan Mysak Clerk: (Minutes) Penny Wood; (RFO) Bohdan Mysak

## PRIVACY POLICY

Leighton Bromswold Parish Council will not use your personal data in any way that goes beyond your reasonable expectations in contacting us.

Council will not store or process any personal data – other than that of Council members, sole traders and other people we work with on Council matters - except when necessary for legal, regulatory or practical requirements.

When contacted by a parishioner, a Councillor will respond directly – by phone or visit – to answer or resolve the query. If the matter is not resolved, the Councillor will be responsible for removing any personal details before bringing the business to Council Meetings or sharing correspondence that will be recorded in Council Minutes.

If the need arises for personal details to be passed on, the Councillor will inform the resident so as to obtain permission for relevant contact details to be passed on to the Council/ Agency who need to carry out the remedial action.

In most cases, however, personal data will be anonymised. (ICO's advice on this may be found at

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/key-definitions/what-is-personal-data/?q=controllers>)

- If personal data can be truly anonymised, then the anonymised data is not subject to the GDPR. It is important to understand what personal data is to understand if the data has been anonymised.
- Information about a deceased person does not constitute personal data and therefore is not subject to the GDPR.
- Information about companies or public authorities is not personal data.
- However, information about individuals acting as sole traders, employees, partners and company directors where they are individually identifiable, and the information relates to them as an individual may constitute personal data.
- But, even if an individual is identified or identifiable, directly or indirectly, from the data you are processing, it is not personal data unless it 'relates to' the individual.
- When considering whether information 'relates to' an individual, you need to consider a range of factors, including the content of the information, the purpose or purposes for which you are processing it and the likely impact or effect of that processing on the individual.

Information that is not deemed personal includes -

- a) Councillor and Clerk contact details, making it easy for residents to contact us about any issues or matters normally dealt with by Council.
- b) Other Council and agency contact details of people with whom we work on Council matters. (Where these details are available on other public sites, no personal data is stored, except where the person is writing or responding to us as an officer/ agent of the Council/ Agency concerned.
- c) The names of service providers, where these are not available elsewhere.
- d) The names of correspondents, parishioners and others, who contact the Council in a matter specific to themselves. Where the matter is of general interest, eg grass cutting in the churchyard, no personal details are processed or stored.
- e) Invoices from sole traders: the invoice must include the name (being the name of the service provider), an address where any legal documents can be delivered and bank details for BACS payment.