



Watton Town Council

Privacy Policy

June 2024

1. INTRODUCTION

- 1.1 This Privacy Policy explains how personal data is collected and used by Watton Town Council (referred to as "WTC", "we", "us", "our" throughout this Privacy Policy).
- 1.2 WTC respects your privacy and is committed to protecting your personal data. We take data protection very seriously and will ensure that we uphold the trust that the community we represent, the individuals within the community, and other visitors and persons, place in us when they provide us with their personal information.
- 1.3 This Privacy Policy will inform you as to how we collect, use, handle and disclose your personal data, as well as telling you about your privacy rights and how the law protects you. If you need any more information about our data protection practices, please contact us using the details below.
- 1.4 This Privacy Policy contains the following sections:
 1. **Important information**
 2. **Data protection principles**
 3. **How we collect information about you**
 4. **What information we collect and how we use it**
 5. **Disclosures of your personal data**
 6. **International transfers**
 7. **Data security**
 8. **Data retention**
 9. **Glossary**
 10. **Your legal rights**
- 1.5 Please use the Glossary to understand the meaning of some of the terms used in this Privacy Policy, including "**personal data**" and "**personal information**".

2. IMPORTANT INFORMATION

2.1 Purpose of this Privacy Policy

- 2.1.1 This Privacy Policy aims to give you information on how WTC collects and processes your personal data, including any data you may provide when you contact us via e-mail, telephone, post or through social media, or any data that you provide through this website (<https://www.wattontowncouncil.gov.uk/>), when you participate in any town council meetings or committees, when you

make any submissions on matters for consideration at any town council meetings or committees, when you attend an event organised by or which involves WTC, when you apply to us for an allotment or a market stall, when you apply to us for any grant, when you subscribe to our publications, or otherwise get in contact with us.

2.1.2 Unless expressly stated otherwise, this website is not intended for children, and we do not knowingly collect data relating to children.

2.1.3 It is important that you read this Privacy Policy together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you, so that you are fully aware of how and why we are using your data. This Privacy Policy supplements the other notices and is not intended to override them.

2.2 **Controller**

2.2.1 WTC is the "controller" for the purposes of data protection law and is therefore responsible for your personal data.

2.2.2 As part of our commitment to you, we have appointed a data compliance manager who is responsible for overseeing questions in relation to this Privacy Policy and WTC's data protection compliance in general. If you have any questions about this Privacy Policy, including any requests to exercise your legal rights (see sections 9.2 and 11.1.1 below), please contact the Data Compliance Manager using the following details:

Contact details

E-mail address: clerk@wattontowncouncil.gov.uk

Telephone number: 01953 881007

2.2.3 You have the right to make a complaint at any time to the Information Commissioner's Office ("**ICO**"), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

2.3 **Changes to the Privacy Policy and your duty to inform us of changes**

2.3.1 This version was last updated on [●] 2024.

2.3.2 We keep this Privacy Policy under regular review and may amend it from time to time.

2.3.3 Data protection law in the United Kingdom changed following the UK's exit from the European Union, and the UK is now directly responsible under its domestic jurisdiction for the implementation of the General Data Protection Regulation (EU) 2016/679 ("**GDPR**"). This implementation includes, but is not limited to, both the Data Protection Act 2018 and the UK's retained EU law version of the GDPR ("**UK GDPR**").

2.3.4 Although this Privacy Policy sets out your rights under the UK GDPR, there may be changes from time to time, as the UK implements the transition from the GDPR to the UK GDPR, or instigates any periodical changes. It may also be the case that changes are made to the UK GDPR, which are not mirrored in the version of the GDPR maintained by the European Union. This Privacy Policy will need to be reviewed and updated on an ongoing basis to ensure compliance. Please check back regularly to view the latest version. Hard copies of this Privacy Policy are available from us on request.

2.3.5 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 relationship with us.

2.4 **Third-party links**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites, including but not limited to, any which are set out on our "Links" page on the website: <https://www.wattontowncouncil.gov.uk/links/> which contain potential sites and pages of interest. We are not responsible for their contents or their privacy statements. When you leave our website, we encourage you to read the privacy policy or notice of every website you visit.

3. **DATA PROTECTION PRINCIPLES**

3.1 WTC adheres to the principles set out in data protection legislation when handling personal data. These principles require personal data to be:

3.1.1 Processed lawfully, fairly and in a transparent manner.

3.1.2 Collected only for specified, explicit and legitimate purposes.

3.1.3 Adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed.

3.1.4 Accurate and where necessary kept up to date.

3.1.5 Not kept in a form which permits identification of data subjects for longer than is necessary for the purposes for which the data is processed.

3.1.6 Processed in a manner that ensures its security using appropriate technical and organisational measures to protect against unauthorised or unlawful processing and against accidental loss, destruction or damage.

3.1.7 Not transferred to another country without appropriate safeguards being in place.

3.1.8 Made available to data subjects and allow data subjects to exercise certain rights in relation to their personal data.

3.2 We are also responsible and accountable for ensuring that we can demonstrate compliance with the data protection principles listed above.

4. **HOW WE COLLECT INFORMATION ABOUT YOU**

4.1 We may collect, use, store and transfer different kinds of personal data about you. We collect and process personal data about you when you:

4.1.1 attend an event, including any town council meetings, committees, or similar events, regardless of whether these are organised, run or provided by us, or are events which we are otherwise involved with;

4.1.2 provide us with your details at any event (such as by providing us with contact details);

4.1.3 request information from us about WTC's ongoing policies, projects, plans procedures, or request any other types of information from us;

4.1.4 make any submission, or provide any statements, views, opinions or comments to us on matters which are to be considered at any meeting, committee or other body of WTC;

- 4.1.5 apply for any allotment, market stall, grant, cemetery plot (or otherwise contact us in respect of the cemetery), or other similar offering from WTC from time to time;
 - 4.1.6 apply for or use any public services which are provided by WTC, or which WTC are otherwise involved with;
 - 4.1.7 contact us via e-mail, telephone, post or through social media; and/or
 - 4.1.8 submit any enquiry to us.
- 4.2 Personal data is usually collected from you through direct interaction with us (either in person, by phone, by e-mail, by post, via social media or through this website). For example, you will provide your personal information when you contact WTC, or where you apply for any opportunities offered by WTC from time to time.
- 4.3 We may collect personal data from partner organisations, other local or regional authorities, or third parties, including through your online profiles, or from other entities that we work with and collect personal data about you, who have provided your personal information to us, either with your consent or on some other lawful basis.
- 4.4 We may also collect personal data when you use this website, through automated technologies, analytics providers or search engine providers. We use cookies to assist the site running as effectively as possible. For further details, please see our Cookies Policy here: <https://www.wattontowncouncil.gov.uk/cookie-policy/>.
- 4.5 For further details on the ways in which we collect personal data, please refer to the table in paragraph 5 below.
- 4.6 **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of any contract, agreement or arrangement with you, and you fail to provide that data when requested, we may not be able to provide the public services, or any contractual arrangement or agreement with you (if applicable), whether in line with the terms of our engagement or otherwise. If so, we may have to terminate our contract with you, or not provide you with the relevant services, but we will notify you if this is the case at the time.

5. WHAT INFORMATION WE COLLECT AND HOW WE USE IT

- 5.1 We may collect, use, store and transfer different kinds of personal data about you through the interactions set out above.
- 5.2 We may also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose, which may be derived from your personal data but is not considered personal data, as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate data about your use of the website. Likewise, we may aggregate data that we collect through providing local services to you. However, if we combine or this data with your personal data so that it can identify you, we treat this as personal data, and use this data in line with this Privacy Policy.
- 5.3 We will not collect or process **Special Categories of Personal Data** (as defined in the Glossary) about you at any time.
- 5.4 **Lawful basis for using your information**
- 5.4.1 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:

- (a) Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- (b) Where we need to comply with a legal obligation.
- (c) Where we need to perform any contract or arrangement we are about to enter into, or have entered into with you.

5.4.2 We may process your personal data for more than one lawful ground depending on the specific purposes for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below:

Types of Data	Collection	How we use your data	Lawful basis for processing
Contact details including your name, address, title, telephone number, e-mail address, and social media details	Personal data is collected through direct interaction with you, including (but not limited to) where you contact us through our website, attend an event organised by us or with which we are otherwise involved, attend or contribute to town council meetings, committees or other bodies, or apply to us for any grants or other opportunities, where you apply for or receive any public services, and additional information (for example, to verify your identity) may be collected from third parties, such as publicly available sources).	Provide you with the information that you request from us, contact you by post, e-mail, telephone and via social media regarding the information that you have requested from us, keep a record of your relationship with us, respond to any enquiries that you submit to us, provide you with access to our relevant publications, generally administer our relationship with you, provide community and individual services and support (including investigating complaints), send you information by post or e-mail about updates and news, comply with our legal and regulatory obligations.	(a) Necessary to comply with a legal obligation (b) Necessary for our legitimate interests (c) Performance of a contract with you
Payment information, including bank account details	Personal data is collected through direct interaction with you, either through our website or otherwise, for example, when you pay for applications or other opportunities provided by us from time to time.	Provide you with public services and information that you request from us, process any financial transactions (including collection of payments in respect of the cemetery, cemetery plots, market fees, allotment fees, building hire fees, payments made for goods and services provided by the Food Hub in which WTC is involved, the management of any additional charges and fees and administration of any refunds), prevent and detect fraud, provide	(a) Performance of a contract or arrangement with you (b) Necessary for our legitimate interests (c) Necessary to comply with a legal obligation

		community and individual service and support (including investigating complaints), personalise your experience on our website, comply with our legal and regulatory obligations.	
Contact history, such as any communications with us by telephone, e-mail, post, through our website or via social media	Personal data is collected through direct interaction with you, including (but not limited to) when you attend one of our events, or attend an event with which we are otherwise involved, attend or contribute to town council meetings, committees or other bodies, or apply to us for any grants or other opportunities, you use any of our public services, or you contact us through our website or social media, or by telephone, post or email.	Keep a record of your relationship with us, respond to any enquiries that you submit to us, generally administer our relationship with you, review and improve our public services and publications we provide, provide support (including investigating complaints), comply with our legal and regulatory obligations, train our staff and carry out quality control.	(a) Performance of a contract or arrangement with you (b) Necessary for our legitimate interests (c) Necessary to comply with a legal obligation
Transaction history, including information about any previous applications or grants you have applied for or received from us, any public services with which you have been provided, and newsletters or publications to which you have subscribed	Personal data is collected through direct interaction with you including (but not limited to) when you attend one of our events, or attend an event with which we are otherwise involved, attend or contribute to town council meetings, committees or other bodies, or apply to us for any grants or other opportunities, receive public services with which we are involved, or from your registration for our publications, newsletters, email communications, or to receive updates.	Keep a record of your relationship with us, respond to any enquiries that you submit to us, generally administer our relationship with you, contact you by post, e-mail, telephone and via social media regarding the services and information that you have requested from us, review and improve our public services and any publications, provide support (including investigating complaints), keep a record of your engagement with our services, including cemetery plots, market stalls, allotments, building hiring and the Food Hub operated by WTC, provide you with information in relation to any of our events, town council meetings or committees, personalise your experience on our website.	(a) Performance of a contract with you (b) Necessary for our legitimate interests
Marketing preferences	Personal data is collected when your register for our publications, newsletters, email	Keep a record of your relationship with us, provide you with access to our relevant publications and newsletters, review and improve our public services	(a) Consent (b) Necessary for our legitimate interests

	communications, or to receive updates.	and publications, provide you with information in relation to any of our events, town council meetings or committees, or any public services, send you information by post or e-mail about updates and news, personalise your experience on our website, and to inform our marketing, public information and informing strategy.	
Technical data such as internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, session replay data and other technology on the devices you use to access the website	Personal data is collected through automated technologies or interactions, from analytics providers or search information providers.	Administer and protect the website and our organisation (including troubleshooting, data analysis, testing and system maintenance and network security), prevent and detect fraud, use data analytics to improve our website, marketing, relationships, user experience and our organisation in general, personalise your experience on our website, allow you to participate in any interactive features on the website.	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security and to prevent fraud) (b) Necessary for our legitimate interests
Health and safety data such as accident book records, RIDDOR, and any other applicable health and safety data and documentation	Personal data is collected through our interactions with you, when you visit any of our premises, or attend any events, town council meetings or committees hosted, organised or otherwise arranged by us.	Keep a record of your relationship with us, generally administer our relationship with you, provide support (including investigating complaints), comply with our legal and regulatory obligations, contact you by post, e-mail, telephone and via social media regarding any information that you have requested from us.	(a) Necessary for our legitimate interests (b) Necessary to comply with a legal obligation.
Video recording data and accompanying sound data from such video recordings	Personal data is collected when you attend our premises by means of our CCTV and other video recording devices, in each case which are located in and on our premises, or where you attend any town council meetings or committees (which may be recorded from time to time), and which may be shared on publicly available forums including YouTube.	To prevent crime, protect buildings and assets from damage disruption vandalism and other crime, to ensure the safety of yourself and others who are on and around our premises, to support law enforcement bodies, assisting in the day to day management of the premises including in respect of health and safety, to provide access and accountability to the wider public in regard to town council proceedings (to which they would otherwise be entitled to attend in person) including in demonstrating the	(a) Necessary for our legitimate interests (b) Consent.

		decision making process within town council meetings.	
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5.5 Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending direct marketing communications to you. You have the right to withdraw consent to marketing at any time by contacting us.

5.6 Marketing and public information

5.6.1 We may use your contact details to send you marketing and public information communications if you are a service user and you have expressly given consent to receive those marketing or public information communications. We may use identity, contact, technical, usage and profile data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which information may be relevant to you.

5.6.2 If you are not a service user and you have requested information from us, you have signed up to one of our publications or newsletters, or you have received goods and/or services from us (including access to any of our market stalls or pitches), we may also use your contact details to send you marketing and public information communications unless you have opted-out of receiving such information.

5.6.3 We will not share your information for marketing and public information purposes with any company or other entity, unless we have your opt-in consent to do so.

5.6.4 You can ask us or third parties to stop sending you marketing and public information messages by contacting us at any time.

5.6.5 Where you opt out of receiving these marketing and public information messages, this will not apply to personal data provided to us as a result of receiving services from us.

5.7 Change of purpose

5.7.1 We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

5.7.2 If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

5.7.3 Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5.8 Cookies

For more information about the cookies we use, please see our Cookie Policy here: <https://www.wattontowncouncil.gov.uk/cookie-policy/>.

6. DISCLOSURES OF YOUR PERSONAL DATA

6.1 We may have to share your personal data with the parties set out below for the purposes set out in paragraph 5 above:

- 6.1.1 Any suppliers, sub-contractors, agents, and/or other local, regional, district or national governing authorities or councils we work with to provide you with public services, or any information that you have requested from us.
 - 6.1.2 Any charities, trusts, or social projects which we are involved in, such as community Food Hubs, and associated service providers, where you apply for, enquire about, or are in receipt of, good, services or other provisions from such ventures.
 - 6.1.3 Any designers who are involved in the creation or design of any of our publications or newsletters.
 - 6.1.4 Service and infrastructure providers who provide IT, security, software, marketing, advertising and system administration services.
 - 6.1.5 Professional advisers acting as processors or joint controllers including lawyers, bankers, experts, accountants, insurers and other third parties who provide legal, banking, consultancy, accounting, insurance and other related services.
 - 6.1.6 HM Revenue & Customs, law enforcement agencies, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- 6.2 We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We may provide third-party advertising companies with Aggregated Data so that you may receive tailored advertisements based on your visits to our website. However, we do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.
- 6.3 We do not and will not sell your personal data to any third party.

7. INTERNATIONAL TRANSFERS

- 7.1 The Council does not as a general principle transfer any personal data outside of the UK, and any such transfers will be irregular and circumstantial.
- 7.2 However, if the Council is ever to transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring that at least one of the following safeguards is implemented:
- 7.2.1 We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data under UK law.
 - 7.2.2 Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection as it has under UK data protection law.
 - 7.2.3 We may also transfer your personal data outside of the UK where you have provided us with your explicit consent for us to do so.
- 7.3 Alternatively, we may transfer your personal data outside the UK where data protection law allows or requires us to do so.
- 7.4 Please contact us if you would like further information on the specific mechanism used by us when transferring your personal data outside the UK.

8. DATA SECURITY

- 8.1 We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or

disclosed. In addition, we limit access to your personal data to those employees, councillors, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

- 8.2 We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

9. DATA RETENTION

9.1 How long will you use my personal data for?

9.1.1 We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting, or reporting requirements. We may retain your personal data for a longer period in the event of a complaint, or if we reasonably believe there is a prospect of litigation in respect of our relationship with you.

9.1.2 To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting and other requirements.

9.1.3 Details of retention periods for different aspects of your personal data are available on request by contacting us using the details above.

9.2 Your legal rights

9.2.1 Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- (a) Request access to your personal data.
- (b) Request correction of your personal data.
- (c) Request erasure of your personal data.
- (d) Object to processing of your personal data.
- (e) Request restriction of processing your personal data.
- (f) Request transfer of your personal data.
- (g) Right to withdraw consent.

9.2.2 If you wish to exercise any of the rights set out above, please contact us.

9.3 No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

9.4 What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any

person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

9.5 **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. **GLOSSARY**

"Personal data", or **"personal information"**, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

"Special Categories of Personal Data" means information revealing racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health conditions, sexual life, sexual orientation, biometric or genetic data, and personal data relating to criminal offences and convictions.

Lawful basis

"Legitimate interest" means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the privacy impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

"Performance of contract" means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

"Comply with a legal or regulatory obligation" means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

11. **YOUR LEGAL RIGHTS**

11.1.1 You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

- 11.1.2 If you have any questions about this Privacy Policy, including any requests to exercise your legal rights (see sections 9.2 and 11.1.1 above), please contact the Data Compliance Manager using the following details:

Contact details

E-mail address: clerk@wattontowncouncil.gov.uk

Telephone number: 01953 881007

- 11.1.3 You have the right to make a complaint at any time to the Information Commissioner's Office ("**ICO**"), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.