

SHERINGHAM TOWN COUNCIL'S WEBSITE PRIVACY NOTICE

The purpose of this notice is to explain how Sheringham Town Council, ("STC" and/or the "Council") processes personal data to fulfil its data protection responsibilities. This notice covers those people whose details are processed when using the Council services including, but not limited to:

- Hiring of the Sheringham Community Centre
- Entering into an allotment tenancy agreement
- The purchase of the exclusive rights to a cemetery plot
- Nominators and nominees for the Sheringham community award scheme
- Details of referees provided by applicants for employment or contract work
- Being recorded by one or more cameras of STC's CCTV system

The role of STC in data protection terms is that of a data controller where it determines the purpose and use of personal data collected. Once received it becomes the responsibility of the STC data manager (DM) to ensure that it is processed in accordance with UK's data protection legislation. The DM can be contacted using dataprotection@sheringhamtowncouncil.gov.uk.

The personal data processed by STC will be basic contact information for the purposes of responding to general enquiries, conducting routine council business, preparing contracts, and setting up invoices. In some instances, it may be necessary to request that STC processes your health-related data, but this would only be done with your explicit consent. If STC is not given all the requested information, it may result in an incomplete service being provided.

In addition, STC manages a CCTV system in and around the town to enhance public safety, and for the prevention and detection of crime. This is subject to a separate management policy and risk assessment. Images are not routinely monitored by STC and are stored for 30 days and the images may be used to assist with public enquiries and/or law enforcement agencies.

STC's duty of confidentiality means that STC will treat personal data with due respect and in confidence. STC expects the same duty of confidentiality of all third parties with whom it shares personal data. It will only be disclosed when lawful circumstances allow. When it is necessary to engage third parties to process personal data, for which STC is the controller, a data processing agreement (or equivalent) between the parties will be put in place.

STC will process your personal data in the UK, which it is backed up locally and with a cloud service provider where the servers are based in the EU. Email is processed using a reputable web-based provider. Email and mobile phone contacts are stored on office IT equipment and mobile phones, including those of the councillors. STC uses appropriate technical and organisational measures to ensure personal data is kept secure.

STC will routinely process your personal data against a lawful basis as described below:

- When it is necessary for the performance of our tasks carried out in the public interest and in exercise of the official authority vested in STC by UK legislation
- To fulfil our contractual obligations to including contract preparation
- When processing is necessary for the purposes of our legitimate interests
- To comply with our legal obligations
- When processing against a pre-defined purpose for which consent has been sought and recorded prior to that processing commencing; please note that consent can be withdrawn at any time by asking the data manager.

In all cases the processing of personal data shall be done in accordance with the principles of data protection set out in UK's data protection legislation.

STC will share your personal data, only when necessary, with some or all the following third parties:

- North Norfolk District Council
- Norfolk County Council
- Administrative support where personnel are bound by a data processing agreement and/or contractual arrangements
- Nominated bank to handle financial transactions when required
- Sheringham Allotment Association for allotment holders
- Nominated, auditors, suppliers and insurance companies

STC follows a retention schedule to determine the length of time it will hold different types of personal data. The retention schedule is held separately but the critical categories are shown below:

- Routine correspondence for casual enquiries in hard copy or in emails will be stored for no longer than one year
- Contract related data will be retained throughout the life of the contract plus another 7 years following the conclusion of the contract
- Contact data is stored indefinitely unless a valid request to erasure is received from the interested data subject
- Financial records and invoices, which may include personal data, will be retained for 7 years

By exception, documentation that includes personal data may be retained by STC beyond the schedule, but only for a specific purpose and only when STC believes there is a legitimate interest or it has a legal obligation to do so.

At the end of the retention schedule STC will either return, destroy or delete your personal data and any associated emails or relevant documentation. If it is technically impractical to delete electronic copies of personal data, it will put it beyond operational use. It should be noted that STC allows up to 3 months after the end of the schedule to complete the action.

The STC website uses cookies and new visitors to the website are asked to consent to non-essential cookies before these are dropped. The website links to other relevant websites; if these are used, please note that STC has no responsibility for the control, content, or handling of visitors' personal data, by these websites.

The UK General Data Protection Regulation (GDPR) defines the rights although these do not apply in all situations. For convenience, these rights are shown below:

- Right to be informed as to how personal data is being processed – this is done through this notice or specific to audience privacy notices
- Right to access personal data held by STC which is done by submitting a 'Data Subject Access Request' (DSAR)
- Right to rectification of personal data if STC has collected it incorrectly or it needs to be updated
- Right to erasure of personal data for which STC no longer has a legitimate purpose to process
- Right to restrict processing under certain circumstances, during which time personal data but will be out of operational use until the matter is resolved
- Right to data portability of personal data in a machine-readable version, but this only applies to data provided with consent or under contract
- Right to object to processing personal data for which STC does not have a legal or contractual obligation
- Rights related to automated decision making and profiling, however STC does not use these techniques in its decision making

Further details on data subject rights can be found on the Information Commissioner's Office (ICO) website: <https://ico.org.uk>.

Raising concerns, exercising rights, or making queries about our processing of personal data can be done by contacting the data manager. Please be aware that STC will need to verify a requesters/enquirer's identity before responding fully. For that reason, STC may ask for proof of identification that, in context, will enable STC to confirm your identity. Alternatively, you may contact the ICO directly, using the details provided above.