NEYLAND TOWN COUNCIL

PRIVACY POLICY AND GDPR

**About General Data Protection Regulation (GDPR)**

The GDPR is a European Union (EU) privacy law that affected councils around the UK when it became enforceable on May 25th 2018. It regulates how any organisation treats or uses personal data of EU citizens, including organisations located outside of the EU. Personal data is any piece of data that, used alone or with with other data, could identify a person. If you collect, change, transmit, erase, or otherwise use or store the personal data of an EU citizen, you will need to comply with the GDPR. The GDPR replaces an older directive on data privacy, Directive 95/46/EC.

**Introduction**

Neyland Town Council needs to gather and use certain information about individuals. These can include customers, suppliers, business contacts, employees and other people the council has a relationship with or may need to contact.

This policy describes how this personal data must be collected, handled and stored to meet the council’s data protection standards and to comply with the law.

**Why this policy exists**

The data protection policy ensures Neyland Town Council:

* Complies with data protection law and follows good practice
* Protects the rights of staff, customers and partners
* Is open about how it stores and processes individual’s data
* Protects itself from the risks of data breach.

**Data Protection Law**

The Data Protection Act 1998 describes how organisations, including Neyland Town Council – must collect, handle and store personal information. These rules apply regardless of whether data is stored electronically, on paper, or on other materials. To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully. The Data Protection Act is underpinned by eight important principles. These say that personal data must:

1. Be processed fairly and lawfully.
2. Be obtained only for specific, lawful purposes
3. Be adequate, relevant and not excessive.
4. Be accurate and kept up to date.
5. Not be held for any longer than necessary
6. Processed in accordance with the rights of data subjects.
7. Be protection in appropriate ways
8. Not be transferred outside the European Economic Area, unless that country or territory also ensures an adequate level of protection.

**Policy Scope**

This policy applies to:

* The office of Neyland Town Council
* All staff and volunteers of Neyland Town Council
* All contractors, suppliers and other people working on behalf of Neyland Town Council.

It applies to all data that the council holds relating to identifiable individuals, even if that information technically falls outside of the Data Protection |Act 1998. This can include:

* Names of individuals
* Postal addresses
* Email addresses
* Telephone numbers
* Plus other information relating to individuals.

**Data Protection Risks**

This policy helps to protect Neyland Town Council from some very real data security risks including:

* Breaches of confidentiality – for instance, information being given out inappropriately.
* Failing to offer choice – for instance, all individuals should be free to choose how the council uses data relating to them.
* Reputational Damage – for instance, the council could suffer of hackers successfully gained access to sensitive data.

**Responsibilities**

Everyone who works for Neyland Town Council has some responsibility for ensuring data is collected, stored and handled appropriately. Everyone that handles personal data must ensure that it is handled and processed in line with this policy and data protection principles.

However, the Town Clerk is ultimately responsible for ensuring that Neyland Town Council meets its legal obligations.

**General Staff Guidelines**

* The only person able to access data covered by this policy should be those who need it for their work.
* Data should not be shared informally.
* Employees should keep all data secure, by taking sensible precautions and follow the guidelines below.
* Strong passwords must be used and should never be shared.
* Personal data should not be disclosed to unauthorised people, either within the council or externally.
* Data should be regularly reviewed and updated if it is found to be out of date. If no longer required, it should be deleted and disposed of.

**Data Storage**

These rules describe how and where data should be safely stored. When data is stored on paper, it should be kept in a secure place where unauthorised people cannot see it.

These guidelines also apply to data that is usually stored electronically but has been printed out for some reason:

* When not required, the paper or files should be kept in a locked drawer or filing cabinet.
* Employees should make use paper and printers are not left where unauthorised people could see them, like a printer.
* Data printouts should be shredded and disposed of securely when not required,

When data is stored electronically, it must be protected from unauthorised access, accidental deletion and malicious hacking attempts.

* Firewalls, antivirus and malware protection are in place and regularly updated.
* Data should be protected by strong passwords that are changed regularly and not shared.
* Data stored on removable media should be kept locked away when not in use.
* Data should only be stored on designated drives and servers and should be uploaded to a secured cloud computing service.
* Data should be backed up frequently and backups tested frequently.
* Data should never be saved directly to laptops, desktops or other mobile devices like tablets or smartphones.

**Data Usage**

Personal data is of no use to Neyland Town Council unless the Council can make use of it, however it is when personal data is accessed and used that it can be at the greatest risk of loss, corruption and theft.

**Data Accuracy**

The law required Neyland Town council to take reasonable steps to ensure data is kept accurate and up to date. The more important it is that the personal date is accurate, the greater the effort Neyland Town council should put into ensuring its accuracy.

* Data will be held in as few places as necessary.
* Every opportunity should be taken to update data.
* Data should be updated as soon as inaccuracies are discovered.

**Subject Access Requests**

All individual who are the subject of personal data held by Neyland town Council are entitled to:

* Ask what information we hold about them and why.
* Ask how to gain access to it.
* Be informed how to keep it up to date.
* Be informed how the Council is meeting its data protection obligations.

If an individual contacts the council requesting the information, this is called a subject access request.

Subject access requests from individuals should be made by email, addressed to the Town Clerk at townclerk@neyland.org.uk

The Town Clerk will always verify the identity of anyone who makes a subject access request before handing over any information.

**Disclosing Data of other reasons**

In certain circumstances the Data Protection Act allows personal data to be disclosed to law enforcement agencies without the consent of the data subject. Under these circumstances Neyland Town Council will disclose requested data. However, the Town Clerk will ensure the request is legitimate, seeking assistance from Members and the council’s legal advisers where necessary.

**Providing information**

Neyland Town Council aims to ensure the individuals are aware that their data is being processed and that they understand:

* How the data is being used
* How to exercise their rights.

**Privacy Policy**

Registered Office: Neyland Town Council, 54 High Street, Neyland, Milford Haven, SA73 1TF.

At Neyland Town Council we are committed to protecting your privacy and security. Please read this Privacy Policy carefully so that you aware of the steps we take to protect your privacy, what information we collect and how we use it now or may use it in the future via the Neyland Town Council website.

Any personal information provided to or gathered by our website is controlled by Neyland Town Council and the Data Protection Officer is the Town Clerk who can be contacted by emailing: townclerk@neyland.org.uk.

What information do we collect and how do we use it?

When you register on the website, or choose to receive further information from us we may use the information you provide us with for the following purposes:

We monitor customer traffic patterns and site usage to help to develop the design and layout of the website. Personal details may be for purposes such as notifying you of Neyland Town Council news and events which may be of interest to you.

Neyland Town Council will not put any information about you on general release not will it sell such information. Personal data will not be transferred outside of the EEC.

**What is a Cookie**

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. The information is used to track visitor use at the website and to compile statistical reports on website activity. For further information about cookies visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allabout](http://www.allabout) cookies.org. You can set your browser not to accept cookies and the above websites will tell you how to remove cookies form your browser.

**Consent and Changes to our Privacy Policy**

By using our website, you consent to collection and use of any information you provide to us. We will keep our Privacy Policy under regular review and if we change our Privacy Policy we will post the changes on our website.

**Disclaimer**

Neyland Town Council recognises that we have legal obligations in terms of the collection and use of personal data made available to use. This website is provided on an ‘AS IS’ basis and we do not warrant or represent that the information contained on this website is accurate or up to date.