

## **Brookfield Village Council**

### **General Data Protection Policy**

**Policy updated and approved by the Village Council : November 2018**

#### **Scope**

'Data Protection Law' includes the General Data Protection Regulation 2016/679; the UK Data Protection Act 2018 and all relevant EU and UK data protection legislation.

This policy applies to all personal data processed by Brookfield Village Council and is part of the Council's approach to compliance with data protection law. All Councillors are expected to comply with this policy.

#### **Data protection principles**

Brookfield Village Council complies with the data protection principles set out below. When processing personal data, it ensures that:

- it is processed lawfully, fairly and in a transparent manner in relation to the data subject ('lawfulness, fairness and transparency')
- it is collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes ('purpose limitation')
- it is all adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation')
- it is all accurate and, where necessary, kept up to date and that reasonable steps will be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ('accuracy')
- it is kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed ('storage limitation')
- it is processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality')

#### **What data do we hold?**

##### **Mailing List**

We hold names, telephone numbers, postal and email addresses from people who have provided us with this information and agreed to join our mailing list so that we can circulate information about village activities and events. At any time a person can ask to have their details updated or their name removed from the list by contacting the Secretary at [brookfieldvpa@gmail.com](mailto:brookfieldvpa@gmail.com)

## Hall letting

We hold information necessary to communicate with hall hirers and to invoice for hall hires. This may include names, addresses and bank details. This information is held securely for a year before being destroyed.

## Photographs

The Village Council maintains an archive of photographs taken at various community events in the village. Photographs may be published for example, on Brookfield Village Facebook; on the website [www.brookfieldvillage.org](http://www.brookfieldvillage.org) or as a slide show for village residents.

If you do not wish to feature in a photograph at a village event you should make yourself known to the Secretary or any other member of the village council at the time of the event or immediately afterwards and the image will be deleted from the archive.

## Process/procedures/guidance

Brookfield Village Council will:

- ensure that all processing of personal data complies with the law
- not do anything with your data that you would not expect given the content of this policy
- only collect and process the personal data that it needs for purposes it has identified in advance
- ensure that, as far as possible, the personal data it holds is accurate, or a system is in place for ensuring that it is kept up to date as far as possible
- only hold onto your personal data for as long as it is needed, after which time Brookfield Village Council will securely erase or delete the personal data.
- ensure that appropriate security measures are in place to ensure that personal data can only be accessed by those who need to access it and that it is held and transferred securely

## Data Subject Rights

Brookfield Village Council has processes in place to ensure that it can facilitate any request made by an individual to exercise their rights under data protection law. All Village Council members are aware of the rights of data subjects so that they can identify such a request and know who to send it to.

All requests will be considered without undue delay and within one month of receipt as far as possible.

**Subject access:** A person has the right to request information about how personal data is being processed, including whether personal data is being processed and the right to be allowed access to that data and to be provided with a copy of that data along with the right to obtain the following information:

- the purpose of the processing
- the categories of personal data
- the recipients to whom data has been disclosed or which will be disclosed

- the retention period
- the right to lodge a complaint with the Information Commissioner's Office
- the source of the information if not collected direct from the subject.

If you have any concerns or queries about Brookfield Village Council's use of your personal data, you should contact the Secretary and if you are not satisfied with the response contact the Chair. If your concern is not adequately addressed, you also have the right to lodge a complaint with the Information Commissioner's Office.

Contact details:-

Secretary (Helen Ostrycharz) [brookfieldvpa@gmail.com](mailto:brookfieldvpa@gmail.com); or mobile 07792392922 or by post Village Hall 45 Woodside Rd, Brookfield PA5 8UB

Chair (Innis Keith) [brookfieldvpa@gmail.com](mailto:brookfieldvpa@gmail.com) or mobile 07414 104321 or by post Village Hall 45 Woodside Rd, Brookfield PA5 8UB

Information Commissioner <https://ico.org.uk>