

# DATA PROTECTION AND PRIVACY POLICY

## Introduction

Looe Town Council is committed to preserving and safeguarding your right to privacy. This policy sets out the way we will collect, use, disclose and otherwise manage your personal information.

The Council needs to keep certain information on its employees, volunteers, service users and Councillors to meet its service delivery objectives and to comply with legal obligations.

We are committed to ensuring the best standards of practice in all our activities. All personal information that is collected is held and used in strict compliance with the General Data Protection Regulation 2018.

## Collection, Processing and Use of Personal Information

Information may be collected online, on paper, by email, telephone, CCTV or in person.

The Town Council uses and holds information to process employee/employment matters, facilitate business agreements, to be able to provide public services, communicate and deal with services requested, to make sure that legal obligations are met, to process financial transactions including grants, payments and invoices and to support public safety and crime detection.

We do not collect any personal information from individuals or groups other than information that is knowingly and voluntarily given. Anonymous information can be collected, such as visitor numbers, but such information is purely statistical and cannot be used to identify individuals.

Looe Town Council has in place a Closed-Circuit Television (CCTV) surveillance system within the town of Looe. The system consists of several fixed cameras located at strategic points in public spaces and is used with the primary purpose of public safety and assisting in the detection and deterring of crime and anti-social behaviour. Images are monitored and recorded centrally in the Town Council's offices. The use of CCTV equipment and the gathering, storage, use and disposal of visual data is subject to our Surveillance Equipment Policy and the guidance given in the Code of Practice issued by the Information Commissioners Office; *'In the Picture: A Data Protection Code of Practice for Surveillance Cameras and Personal Information.'*

## Use of Websites

You can browse our websites without disclosing any information about yourself, however by entering your details in any field request, such as your name, email address, postal address or telephone/mobile number you enable us to provide you with the information and service requested. In all cases, we will only ask for information we need to provide you with those service(s). Cookies are not used to collect any other personal information from visitors to our sites.

The Town Council and Visit Looe websites may be used by local organisations to provide information, particularly contact information and links, regarding themselves. Such information shall be deemed to have been given with the consent of that organisation and the consent of the organisation's appointed contact representative and will be placed in the public domain. Looe

Town Council does not accept any responsibility or liability for the privacy practices of third-party organisations using our website.

## **Use of Social Media**

The Town Council's use of Social Media is explained in our 'Use of Social Media Policy'. Posts to the Social Media platforms used by us (e.g. Facebook, Twitter, Instagram) are in the public domain.

Personal or private messages must not be sent to the Town Council via Social Media.

## **People Who Make a Complaint to the Town Council**

The information you provide will be shared with the service area which relates to your complaint. If further processing is needed, you will be advised of this by the person(s) dealing with your complaint. Where we need to liaise with a third party who provides services on the Council's behalf, we will only share details of the issue and not your personal information. We will contact you to obtain your permission if it becomes necessary to pass on any personal information.

## **Sharing and Disclosure of Personal Information**

We do not sell your personal information to anyone, nor do we share your personal information with any third parties unless they are providing services to us under contract or disclosure is permitted or required by law. If we don't have a statutory duty to share information, we will not disclose personal data without your consent.

## **Data Security & Protection**

Your privacy is very important to us, and we take measures to ensure your personal information is properly protected and secured. We will never send any unsolicited message asking you to provide any password, financial detail or other sensitive information by mail, email or through a link.

We take appropriate measures to safeguard the information we hold from unauthorised access, improper use or unlawful loss or disclosure. Correspondence and Documents are kept in a secure environment. Electronic databases are stored in secure, password protected locations accessible only by authorised users. Office Use Personal Computers, Laptops and Tablets are encrypted and are protected by security software.

## **Personal Data Security Breaches**

Councillors and employees must report immediately any breaches in the security of personal data. This means any breach of security leading to the accidental or unlawful loss, destruction, alteration, unauthorised disclosure of, or access to, personal data.

The Town Clerk must be informed of a security breach and a written reports should be made as soon as possible using the Personal Data Security Breach Form (Appendix A). On receipt of a completed form, the Town Clerk will take appropriate action which may include informing individuals who may be affected by the breach, and notifying the Information Commissioners

Office. The Town Clerk will record actions taken to deal with the breach in security and to avoid a similar recurrence.

## **Data Integrity**

We take all reasonable steps to ensure that the information we hold is both correct and accurate. Individuals may request details of all personal information held by us to verify its accuracy, have it corrected, or have it removed from the Town Council's files, including any files that may be retained by individual Councillors in the pursuance of Council business.

## **Information Retention**

The Town Council will only retain personal information for as long as necessary in the pursuance of its business activities and service delivery. Information that is no longer required or which is out of date will be deleted or otherwise appropriately destroyed.

Staff follow document retention guidelines which determine the period for which documents or other information may, or must, be retained before being deleted or otherwise destroyed.

## **Your rights**

Under Data Protection legislation, you have rights as an individual which you can exercise in relation to the information we hold about you.

Anyone whose personal information we process has the right to know:

- What information we hold and process on them
- How to gain access to this information
- How to keep it up to date
- What we are doing to comply with the Data Protection legislation

You also have the right to prevent processing of your personal data in some circumstances and the right to correct, rectify, block or erase information regarded as wrong.

## **Contact and Complaints**

Any queries or requests relating to our collection, use or disposal of personal information should be addressed to:

**The Town Clerk, Looe Town Council**

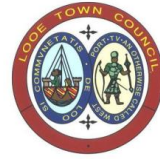
**Looe Library and Community Hub, The Millpool, West Looe, PL13 2AF**

Similarly, any complaints regarding the collection, use, retention or disposal of personal information should be sent to the same address.

We would prefer any complaints to be made to us initially so that we have the opportunity to remedy the problem. However, if you are unhappy with the way that we have processed your information or how we have responded to your request to exercise any of your rights in relation to your data, you can raise your concerns direct with the Information Commissioner's Office -

Tel: 0303 123 1113 or online: <https://ico.org.uk/concerns>

**PERSONAL SECURITY  
DATA BREACH REPORT FORM**



If you discover a personal data security breach, please contact the Town Clerk immediately.  
Please complete this form as soon as possible after the breach and send to the Town Clerk.

**NOTIFICATION OF DATA SECURITY BREACH**

Date(s) of breach	
Date breach discovered	
Name of person reporting	
Description of data security breach	
Number of data subject affected (if known)	
Description of any action taken since breach was discovered	

**ACTION TAKEN BY TOWN CLERK**

Date of receipt	
Actions taken	
Further action required	
Signed by Town Clerk	