
THURLESTONE PARISH COUNCIL

DATA PROTECTION POLICY

Approved: May 2025

Review Period: 3 years

Next Review Date: May 2028

Contents

- 1. Purpose and Scope 3
- 2. Definitions 3
- 3. Data Protection Principles 3
- 4. Lawful Basis for Processing 4
- 5. Information the Council Collects 4
- 6. How the Information is Used 4
- 7. Using the Parish Council’s Website 4
- 8. Information Sharing 4
- 9. Transfer of Data Outside the UK 5
- 10. Data Retention 5
- 11. Protecting Your Information 5
- 12. Data Breach Procedure 5
- 13. Rights of Individuals 5
- 14. Review of Policy 5



1. Purpose and Scope

1.1 This policy sets out Thurlestone Parish Council's commitment to data protection and compliance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

1.2 For information on how the Council collects, uses, and protects personal data from a public perspective, please refer to the **Thurlestone Parish Council Privacy Notice**.

2. Definitions

2.1 Personal Data

Information relating to an identified or identifiable living individual.

2.2 Data Subject

An individual whose personal data is held by the Council.

2.3 Processing

Any operation performed on personal data, including:

- collection, recording, organisation, or storage
- adaptation or alteration
- retrieval, consultation, or use
- disclosure or dissemination
- alignment or combination
- restriction, erasure, or destruction

2.4 Data Protection Officer (DPO)

The Clerk is the designated DPO for Thurlestone Parish Council.

2.5 Data Controller

Thurlestone Parish Council, as a corporate body, determines the purposes and means of processing personal data.

2.6 Data Processor

An external organisation processing data on behalf of the Council (e.g., payroll provider, IT hosting company).

3. Data Protection Principles

Thurlestone Parish Council complies with Article 5 UK GDPR. Personal data must be:

- processed lawfully, fairly, and transparently
- collected for specified, explicit, and legitimate purposes
- adequate, relevant, and limited to what is necessary
- accurate and kept up to date
- retained only as long as necessary
- processed securely
- handled in a way that demonstrates accountability

All councillors, employees, and volunteers must comply with these principles.

4. Lawful Basis for Processing

4.1 The Council ensures all processing has a lawful basis under Article 6 UK GDPR. The main bases used are:

- **Public Task**
- **Legal Obligation**
- **Contract**
- **Consent**
- **Vital Interests**

4.2 Where Special Category Data is processed, an additional Article 9 lawful basis will be identified.

5. Information the Council Collects

5.1 The Council only uses personal information for the purposes for which it is provided. This may include names, addresses, email addresses, and other relevant details.

5.2 The Council's **Data and Information Register** is available upon request.

6. How the Information is Used

Personal data may be used to:

- process enquiries and applications
- provide services to residents, including meeting notifications, agendas, minutes, and newsletters
- administer employment and contractor records
- provide online services
- enable partner organisations to deliver services
- support service planning and improvement
- produce aggregated statistical information
- collect or process payments

Personal data will **not** be used for marketing without explicit consent.

7. Using the Parish Council's Website

7.1 The Council may collect personal information when individuals:

- subscribe to services
- report faults
- contact the Council

7.2 Cookies and analytics may be used to improve online services.

7.3 Further details are available in the **Privacy Notice**.

8. Information Sharing

8.1 The Council may share information with public authorities or emergency services where necessary for public interest, safety, or law enforcement.

8.2 Where third parties process data on behalf of the Council, appropriate data protection agreements will be in place.

8.3 The Council does **not** sell or distribute personal data for commercial purposes.

9. Transfer of Data Outside the UK

The Council will only transfer personal data outside the UK where appropriate safeguards are in place in accordance with UK GDPR.

10. Data Retention

10.1 The Council follows its **Retention and Disposal of Documents Policy**.

10.2 Where individuals request removal of their data, the Council may retain a minimal core record to prevent future contact errors and meet statutory obligations.

11. Protecting Your Information

Security measures include:

- restricted access
 - encryption and secure storage
 - regular staff training
 - breach reporting and investigation
-

12. Data Breach Procedure

12.1 A personal data breach includes accidental or unlawful loss, alteration, disclosure, or access.

12.2 All breaches must be reported immediately to the DPO.

12.3 Further details are set out in the **Information Security Incident Policy**.

13. Rights of Individuals

Individuals have the right to:

- access their personal data
- request correction
- request deletion (where applicable)
- object to processing
- restrict processing
- data portability
- understand any automated decision-making (not currently used by the Council)

Contact Details

Data Protection Officer

Clerk, Thurlestone Parish Council

Email: clerk@thurlestoneparishcouncil.gov.uk

If dissatisfied, individuals may appeal to the **Information Commissioner's Office (ICO)**.

14. Review of Policy

This policy will be reviewed every three years or sooner if required by changes in legislation.
