**WHO ARE WE?**

This Privacy Notice is provided to you by the (*Insert Name*) Community Council which is the Data Controller for your data.

(*Insert Name*) Community Council is committed to protecting your personal information and respecting your privacy. This policy details information on when and why we collect your personal information, how we use it, and how we keep it secure.

This Privacy Notice explains in detail the types of personal data we may collect about you when you interact with us. It also explains how we store and handle your data and keep it safe. We want you to be fully informed about your rights, and how (*insert name*) Community Council uses your data. We hope the following sections will answer any questions you have, but if not, please do not hesitate to contact us.

**YOUR PERSONAL DATA – WHAT IS IT?**

‘Personal Data’ is any information about a living individual which allows them to be identified from that data (for example a name, photograph, video, email address, or address). Identification can be directly using the data itself or by combining it with other information which helps to identify a living individual. The processing of personal data is governed by legislation relating to personal data which applies in the UK including the General Data Protection Regulation (the GDPR) and other legislation relating to personal data and rights such as the Human Rights Act.

* Other Data Controllers (*insert name*) Community Council works with:
* Midlothian Council.
* Other Community Councils.
* Community groups.
* Charities.

We may need to share your personal data we hold with them so that they can carry out their responsibilities to the Council. (*insert Name)* Community Council and other Data Controllers may be ‘joint Data Controllers’ which means we are all collectively responsible to you for your data. Where each of the parties listed above are processing your data for their own independent purposes then each of us will be independently responsible to you and if you have any questions or wish to exercise any of your rights (see below) or wish to raise a complaint, you should do so directly with the relevant Data Controller.

A description of what personal data (*Insert Name)* Community Council processes and for what purpose is set out in this Privacy Notice.

(*Insert Name)***COMMUNITY COUNCIL MAY COLLECT YOUR PERSONAL DATA IN THE FOLLOWING CIRCUMSTANCES:**

* When you visit our website.
* When you contact us by any means to access our services.
* When you contact us by any means with queries, complaints, etc.
* When you ask us to email you information about our services.
* When you comment on or review our services.
* When you complete any forms.

(*Insert Name)* Community Council may process some or all the following personal data where necessary to perform its tasks:

* Names, titles, and aliases, photographs.
* Contact details such as telephone numbers, addresses, and email addresses
* Where they are relevant to the services provided by our Community Council, or where you provide them to us, we may process information such as gender, age, marital status, nationality, ethnicity, education/work, history, academic/professional qualifications, hobbies, family composition, and dependants.
* Where financial transaction occurs (grants, hall hire, donations, projects), financial identifiers such as bank account numbers, payment card numbers, payment/transaction identifiers.

**HOW WE USE SENSITIVE PERSONAL DATA**

* We may process sensitive personal data including, as appropriate:
* Your racial or ethnic origin or religious or similar information to monitor compliance with equal opportunities legislation.
* To comply with legal requirements and obligations to third parties.
* These types of data are described in the GDPR as ‘special categories of data’ and require higher levels of protection. We need to have further justification for collecting, storing, and using this type of personal data.
* We may process special categories of personal data in the following circumstances
* In limited circumstances, with your explicit written consent.
* Where we need to carry out our legal obligations.
* Where it is needed in the public interest.

**DO WE NEED YOUR CONSENT TO PROCESS YOUR PERSONAL DATA?**

* In limited circumstances, we may approach you for your written consent to allow us to process certain sensitive personal data. If we do so, we will provide you with full details of the personal data that we would like and the reason we need it, so that you can carefully consider whether you wish to consent.

**(***Insert Name****)* COMMUNITY COUNCIL WILL COMPLY WITH DATA PROTECTION LAW. THIS SAYS THAT THE PERSONAL DATA WE HOLD ABOUT YOU MUST BE:**

* Used lawfully, fairly and in a transparent way.
* Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
* Relevant to the purposes we have told you about and limited only to these purposes.
* Accurate and kept up to date.
* Kept only as long as necessary for the purposes we have told you about.
* Kept and destroyed securely, including ensuring that appropriate technical and security measures are in place to protect your personal data from loss, misuse, unauthorised access, and disclosure.

**WE USE YOUR PERSONAL DATA FOR SOME OR ALL OF THE FOLLOWING PURPOSES**

* To deliver our public services including to understand your needs to provide the service that you request and to understand what we can do for you and inform you of other relevant services.
* To confirm your identity to provide some services.
* To contact you by post, email, telephone or using social media (e.g., ‘Facebook’, ‘X’, ‘WhatsApp’).
* To help us build a picture of how we are performing.
* To prevent and detect fraud and corruption in the use of public funds where necessary for law enforcement functions.
* To carry out comprehensive safeguarding procedures (including due diligence and complaints handling) in accordance with best safeguarding practice from time to time with the aim of ensuring that all children and adults-at-risk are provided with safe environments and generally as necessary to protect individuals from harm or injury.
* To promote the interests of (*Insert Name)* Community Council.
* To maintain our own accounts and records.
* To seek your views, opinions, or comments.
* To notify you of changes to our service, events, and councillors.
* To send you communications which you have requested and that may be of interest to you.
* These may include information about campaigns, appeals and other new projects or initiatives.
* To process relevant financial transactions including grants, donations and payments for goods and projects.
* To allow statistical analysis of data so we can plan our provision of services.

**COOKIES**

To help improve this site we place small files, known as cookies, onto your computer. Our cookies are there to make the site work better for you, and to allow you to use while logged in. They do this by:

* Measuring how you use the website so it can be improved to meet your needs.
* Ensuring the website works properly.
* Remembers the notifications you’ve seen so that we do not show them to you again.
* Identifying you once you have logged in to the site (if log in is required).

You can manage these small files as you wish. You can even decide to stop any site from using them. To learn more about cookies and how to manage them visit <https://www.aboutcookies.org/>.

**HOW WE USE COOKIES**

We use cookies for several purposes on our website - we have listed each of them below with more details about why we used them and how long they will last.

We use Google Analytics to collect information about how people use our site, and rough demographics as to what groups of people are using our site. We do this to make sure we are meeting your needs and to understand how we could improve it. You can opt out of Google Analytics tracking.

Google analytics stores information about:

* The pages you visit.
* How long you spend on each page.
* How you got to the site.
* What you click on while you are on the site.
* Your broad demographic profile (age range, gender, interests).

We do not collect or store your personal information (e.g. your name or address) so this information cannot be used to identify who you are.

**WEBSITE OPERATION**

The system that runs our website sets cookies to allow it to run smoothly.

**WHAT IS THE LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA?**

(*Insert Name)* Community Council is a statutory body and has certain powers and obligations. Most of your personal data is processed for compliance with a legal obligation which includes the discharge of our statutory functions and powers. Sometimes when exercising these powers or duties it is necessary to process personal data of residents or people using our services. We will always take into account your interests and rights. This Privacy Notice sets out your rights and (*Insert Name)* Community Council’s obligations to you.

**SHARING YOUR PERSONAL DATA**

This section provides information about the third parties with whom (*Insert Name)* Community Council may share your personal data. These third parties have an obligation to put in place appropriate security measures and will be responsible to you directly for the manner in which they process and protect your personal data. It is likely that we will need to share your data with some or all the following (but only where necessary):

* The Data Controllers listed above under the heading ‘Other Data Controllers (*Insert Name)* Community Council works with’.
* Our suppliers – for example, we may ask a commercial provider to publish or distribute leaflets, newsletters, etc. on our behalf, or to maintain our database software.
* On occasion, other local authorities or not for profit bodies with which we carry out joint ventures e.g. in relation to facilities or events for the community.

**HOW LONG DO WE KEEP YOUR PERSONAL DATA?**

We will keep some records permanently if we are legally required to do so. We may keep some other records for an extended period. For example, it is currently best practice to keep financial records for a minimum period of 8 years to support HMRC audits or provide tax information. We may have legal obligations to retain some data in connection with our statutory obligations as a public body. (*Insert Name)* Community Council is permitted to retain data to defend or pursue claims. In some cases, the law imposes a time limit for such claims (for example 3 years for personal injury claims or 6 years for contract claims). We will retain some personal data for this purpose if we believe it is necessary to be able to defend or pursue a claim. In general, we will endeavour to keep data only for as long as we need it.

This means that we will delete it when it is no longer needed.

**YOUR RIGHTS AND YOUR PERSONAL DATA**

You have the following rights with respect to your personal data:

When exercising any of the rights below, to process your request, we may need to verify your identity for your security. In such cases we will need you to respond with proof of your identity before you can exercise these rights.

1. **The right to access personal data we hold.**
* At any point you can contact us to request the personal data we hold about you as well as why we have that personal data, who has access to the personal data and where we obtained the personal data. Once we have received your request, we will respond within one month.
* There are no fees or charges for the first request, but additional requests for the same personal data or requests which are manifestly unfounded or excessive may be subject to an administrative fee.
1. **The right to correct and update the personal data we hold.**
* If the data we hold about you is out of date, incomplete or incorrect, you can inform us, and your data will be updated.
1. **The right to have your personal data erased**
* If you feel that we should no longer be using your personal data or that we are unlawfully using your personal data, you can request that we erase the personal data we hold.
* When we receive your request, we will confirm whether the personal data has been deleted or the reason it cannot be deleted (for example because we need it to comply with a legal obligation).
1. **The right to object to processing of your personal data or to restrict it to certain purposes only**
* You have the right to request that we stop processing your personal data or ask us to restrict processing. Upon receiving the request, we will contact you and let you know if we are able to comply or if we have a legal obligation to continue to process your data.
1. **The right to data portability**
* You have the right to request that we transfer some of your data to another controller. We will comply with your request, where it is feasible to do so, within one month of receiving your request.
1. **The right to withdraw your consent to the processing at any time for any processing of data which consent was obtained**
* You can withdraw your consent easily by telephone, email or by post (see contact details below).
1. **The right to lodge a complaint with the** **Information Commissioner’s Office**
* You can contact the Information Commissioner’s Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

**FURTHER PROCESSING**

If we wish to use your personal data for a new purpose, not covered by this Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

**CHANGES TO THIS NOTICE**

We keep this Privacy Notice under regular review, and we will place any updates on this web page.

(*Insert Community Council Website address*).

This Privacy Notice was last updated on (*Insert Date*).

**CONTACT DETAILS**

Please contact us if you have any questions about this Privacy Notice or the personal data, we hold about you or to exercise all relevant rights, queries, or complaints at:

The Data Controller, (*Insert Name*) Community Council.

**Email:** (*Insert Community Council Email address).*