

Privacy Statement

Stromeferry & Achmore Community Council

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Please Read This Notice Carefully

This privacy statement explains how Stromeferry & Achmore Community Council collects, uses, stores, and protects your personal information. It describes your legal rights relating to your personal information and how you can exercise them.

We are committed to protecting and respecting your privacy in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and all other applicable data protection legislation.

1. Who We Are

Stromeferry & Achmore Community Council is a statutory body established under the Local Government (Scotland) Act 1973. We serve the communities of Stromeferry and Achmore in the Highland region of Scotland, within the Wester Ross, Strathpeffer and Lochalsh ward.

Our Role: We act as a voice for our local community, representing the views and interests of residents to Highland Council and other public bodies. We facilitate community engagement, support local initiatives, and work to improve the quality of life for people living in our area.

Contact Details:

1. **Postal Address:** [Community Council Address to be inserted]

2. **Email:** achmorestromecc@gmail.com
3. **Website:** <https://www.stromeferry-and-achmore.co.uk/>

Data Controller Status: For the purposes of data protection law, Stromeferry & Achmore Community Council is the data controller in relation to the processing of your personal data. This means we determine the purposes and means of processing your personal information.

2. Legal Basis for Processing Personal Data

We process personal data only where we have a lawful basis to do so under Article 6 of the UK GDPR. The legal bases we rely on include:

Legitimate Interest (Article 6(1)(f)): We have a legitimate interest in communicating effectively with our community members, stakeholders, and partners to fulfil our statutory role as a community council. This includes maintaining contact databases, organizing community events, and facilitating democratic participation.

Consent (Article 6(1)(a)): Where you have freely given, specific, informed, and unambiguous consent for us to process your personal data for particular purposes, such as subscribing to our newsletter or participating in surveys.

Legal Obligation (Article 6(1)(c)): Where we are required by law to process personal data, such as maintaining records of community council meetings and decisions as required under local government legislation.

Public Task (Article 6(1)(e)): Where processing is necessary for the performance of our statutory functions as a community council established under the Local Government (Scotland) Act 1973.

Before processing your personal data, we carefully consider which legal basis is most appropriate. Where we rely on legitimate interest, we conduct a balancing test to ensure that our interests do not override your fundamental rights and freedoms.

3. What Personal Information We Collect

We collect and process personal data about you in different ways, depending on how you interact with us. The information we collect includes:

3.1 Contact and Communication Data

When you contact us directly:

1. Name and title
2. Email address
3. Postal address
4. Telephone number
5. The content of your communications with us
6. Any other information you choose to provide

When you attend our meetings:

1. Name (if you choose to identify yourself)
2. Contact details (if you provide them)
3. Any comments or contributions you make during public participation

3.2 Website and Digital Communications

When you visit our website:

1. IP address and location data
2. Browser type and version
3. Operating system
4. Pages visited and time spent on each page
5. Referring website
6. Date and time of visit

When you subscribe to our communications:

1. Name
2. Email address
3. Communication preferences
4. Subscription date and status

3.3 Event and Meeting Participation

When you participate in community events or meetings:

1. Name and contact details
2. Attendance records
3. Participation in discussions or activities
4. Photographs or recordings (with explicit consent)
5. Feedback and evaluation responses

3.4 Correspondence and Complaints

When you correspond with us or make complaints:

1. All information contained in your correspondence
2. Records of our responses and actions taken
3. Any supporting documentation you provide
4. Case reference numbers and tracking information

4. How We Use Your Personal Information

We use your personal information for the following purposes:

4.1 Community Representation and Engagement

We process your personal data to fulfil our primary function as a community council, including:

1. Responding to inquiries and concerns from community members
2. Representing community views to Highland Council and other public bodies
3. Facilitating public participation in local decision-making processes
4. Organizing and conducting community meetings and events
5. Consulting with residents on local issues and developments

4.2 Communication and Information Sharing

We use your contact information to:

1. Send you information about community council activities and decisions
2. Notify you of upcoming meetings, events, and consultations
3. Share relevant news and updates about local developments
4. Distribute newsletters and other community communications
5. Respond to your inquiries and provide requested information

4.3 Administrative and Legal Requirements

We process personal data to meet our administrative and legal obligations:

1. Maintaining accurate records of community council proceedings
2. Complying with freedom of information requests
3. Meeting transparency and accountability requirements
4. Managing our website and digital communications
5. Handling complaints and feedback appropriately

4.4 Event Management and Community Activities

When organizing events and activities, we use personal data to:

1. Manage event registrations and attendance
2. Ensure appropriate facilities and resources are available
3. Communicate event details and updates to participants
4. Collect feedback and evaluate event success
5. Maintain photographic records (with consent) for promotional purposes

5. How We Share Your Personal Information

We may share your personal information in the following circumstances:

5.1 Highland Council and Public Bodies

We share relevant information with Highland Council and other public bodies when:

1. Representing community views on planning applications or local developments
2. Participating in consultation processes
3. Reporting on community council activities and decisions
4. Seeking support or resources for community projects
5. Fulfilling our statutory reporting requirements

5.2 Community Partners and Organizations

We may share information with local organizations and community groups when:

1. Collaborating on community projects or initiatives
2. Coordinating events or activities
3. Sharing resources or expertise
4. Promoting community engagement and participation

5.3 Service Providers and Contractors

We may share personal data with trusted service providers who help us deliver our services:

1. Website hosting and maintenance providers
2. Email and communication service providers
3. Event management and venue providers
4. Professional advisors (legal, financial, technical)

All service providers are required to maintain appropriate security measures and use personal data only for the specified purposes.

5.4 Legal Requirements

We may disclose personal information where required by law:

1. In response to court orders or legal proceedings
2. To comply with regulatory requirements
3. To protect our legal rights or those of others
4. In connection with freedom of information requests

5. Where disclosure is necessary for public safety or crime prevention

6. How Long We Keep Your Personal Information

We retain personal information only for as long as necessary to fulfil the purposes for which it was collected, comply with legal requirements, and protect our legitimate interests.

6.1 General Retention Periods

Contact and communication data: Retained for the duration of our relationship with you, plus 3 years after last contact, unless you request earlier deletion.

Meeting and event records: Retained for 6 years in accordance with local government record-keeping requirements.

Website analytics data: Retained for 2 years for analysis and improvement purposes.

Correspondence and complaints: Retained for 6 years or until resolution, whichever is longer.

6.2 Legal and Statutory Records

Some records must be retained for longer periods to comply with legal requirements:

1. Community council meeting minutes: Permanent retention as public records
2. Financial records: 6 years as required by accounting standards
3. Planning and development consultations: Retained in accordance with Highland Council requirements

6.3 Secure Disposal

When personal data is no longer required, we ensure it is securely deleted or destroyed using appropriate methods to prevent unauthorized access or recovery.

7. Your Rights Under Data Protection Law

Under the UK GDPR and Data Protection Act 2018, you have several important rights regarding your personal data:

7.1 Right of Access (Article 15)

You have the right to request a copy of the personal data we hold about you, along with information about how we process it. This is commonly known as a "subject access request."

7.2 Right to Rectification (Article 16)

You have the right to request that we correct any inaccurate or incomplete personal data we hold about you.

7.3 Right to Erasure (Article 17)

In certain circumstances, you have the right to request that we delete your personal data. This right applies when:

1. The personal data is no longer necessary for the original purpose
2. You withdraw consent and there is no other legal basis for processing
3. The personal data has been unlawfully processed
4. Deletion is required for compliance with a legal obligation

7.4 Right to Restrict Processing (Article 18)

You have the right to request that we limit how we use your personal data in certain circumstances, such as when you contest the accuracy of the data or object to processing.

7.5 Right to Data Portability (Article 20)

Where we process your personal data based on consent or contract, and the processing is automated, you have the right to receive your data in a structured, commonly used format.

7.6 Right to Object (Article 21)

You have the right to object to processing based on legitimate interest or for direct marketing purposes. We will stop processing unless we can demonstrate compelling legitimate grounds that override your interests.

7.7 Rights Related to Automated Decision-Making

You have rights regarding automated decision-making and profiling. However, we do not currently engage in automated decision-making that produces legal or similarly significant effects.

8. How to Exercise Your Rights

To exercise any of your data protection rights, please contact us using the details provided in Section 1. When making a request, please:

1. Clearly state which right you wish to exercise
2. Provide sufficient information to help us locate your personal data
3. Include proof of identity (copy of passport or driving license)
4. Specify your preferred method of response

We will respond to your request within one month of receipt, though this may be extended by up to two months for complex requests. We will inform you of any extension and the reasons for it.

Most requests can be fulfilled free of charge. However, we may charge a reasonable fee for manifestly unfounded or excessive requests, or for additional copies of information already provided.

9. Data Security and Protection Measures

We take the security of your personal data seriously and have implemented appropriate technical and organizational measures to protect it against unauthorized access, alteration, disclosure, or destruction.

9.1 Technical Safeguards

1. Secure hosting and storage systems with encryption
2. Regular security updates and patches
3. Access controls and authentication measures
4. Secure transmission of data using encryption protocols
5. Regular backups with secure storage

9.2 Organizational Measures

1. Staff training on data protection principles and procedures
2. Clear policies and procedures for handling personal data
3. Regular review and updating of security measures
4. Incident response procedures for data breaches
5. Vendor management and due diligence processes

9.3 Access Controls

Access to personal data is restricted to authorized personnel who need it to perform their duties. All access is logged and monitored, and we regularly review access permissions to ensure they remain appropriate.

10. Data Transfers and International Processing

We primarily process personal data within the United Kingdom. However, some of our service providers may process data outside the UK. Where this occurs, we ensure appropriate safeguards are in place:

1. Adequacy decisions by the UK government
2. Standard contractual clauses approved by the UK authorities
3. Binding corporate rules or codes of conduct
4. Certification schemes recognized under UK data protection law

We will inform you of any international transfers and the safeguards in place when collecting your personal data.

11. Cookies and Website Analytics

Our website uses cookies and similar technologies to improve your browsing experience and help us understand how our website is used.

11.1 Types of Cookies We Use

Essential Cookies: Necessary for the website to function properly and cannot be disabled.

Analytics Cookies: Help us understand how visitors interact with our website by collecting and reporting information anonymously.

Functional Cookies: Enable enhanced functionality and personalization, such as remembering your preferences.

11.2 Managing Cookies

You can control and manage cookies through your browser settings. However, disabling certain cookies may affect the functionality of our website.

For more detailed information about our use of cookies, please refer to our separate Cookie Policy available on our website.

12. Children's Privacy

We do not knowingly collect personal data from children under the age of 13 without appropriate parental consent. If you are under 13, please ask your parent or guardian to contact us on your behalf.

If we become aware that we have collected personal data from a child under 13 without parental consent, we will take steps to delete that information promptly.

For children aged 13-16, we may process personal data with the child's consent for certain activities, but we encourage parental involvement in such decisions.

13. Changes to This Privacy Statement

We may update this privacy statement from time to time to reflect changes in our practices, legal requirements, or for other operational reasons. When we make significant changes, we will:

1. Update the "Last Updated" date at the top of this statement
2. Notify you through our website and other communication channels
3. Provide a summary of key changes where appropriate
4. Ensure the updated statement is easily accessible on our website

We encourage you to review this privacy statement periodically to stay informed about how we protect your personal data.

14. Complaints and Further Information

14.1 Making a Complaint to Us

If you have concerns about how we handle your personal data, please contact us first using the details in Section 1. We will investigate your complaint promptly and work to resolve any issues.

14.2 Information Commissioner's Office (ICO)

If you are not satisfied with our response to your complaint, you have the right to lodge a complaint with the Information Commissioner's Office (ICO), the UK's independent data protection regulator.

ICO Contact Details:

1. **Website:** <https://ico.org.uk/>
2. **Telephone:** 0303 123 1113
3. **Post:** Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

14.3 Additional Resources

For more information about data protection and your rights, you can visit:

1. Information Commissioner's Office: <https://ico.org.uk/>
2. Scottish Community Councils: <https://www.communitycouncils.scot/>
3. Highland Council: <https://www.highland.gov.uk/>

15. Contact Information

For any questions about this privacy statement or to exercise your data protection rights, please contact us:

Stromeferry & Achmore Community Council

1. **Email:** achmorestromecc@gmail.com
2. **Post:** [Address to be inserted]
3. **Website:** <https://www.stromeferry-and-achmore.co.uk/>

Data Protection Officer: John Taylor

We aim to respond to all inquiries within 5 working days and will provide a full response within one month where required by law.

This privacy statement was prepared in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and guidance from the Information Commissioner's Office. It reflects best practices for community councils in Scotland as of June 2025.