

Schedule B: Data Protection Policy

1. Introduction

The Trustees, elected officers of Egmonton Village Meeting and appointed sub committees recognise their responsibility to comply with the General Data protection Regulations (GDPR) 2018, which regulates the use of personal data. This does not have to be sensitive data; it can be as little as a name and address.

2. General Data Protection Regulations (GDPR)

The GDPR sets out high standards for the handling of personal information and protecting individuals' rights for privacy. It also regulates how personal information can be collected, handled and used. The GDPR applies to anyone holding personal information about people, electronically or on paper. Egmonton Village Meeting does not, as a matter of course, retain information about people, although it recognises that in the future it could come into possession of such information freely provided for unspecified, but specific purposes. Egmonton Village is in the process of notifying the Information Commissioner that it holds personal data about individuals.

When dealing with personal data, The Trustees, elected officers of Egmonton Village Meeting and appointed sub committees must ensure that:

- Data is processed fairly, lawfully and in a transparent manner. This means that personal information should only be collected from individuals for specific, explicit and legitimate purposes only, and if and only if, that need has openly and honestly been made known.
- Data is relevant to what it is needed for. Data will be monitored in order that too much or too little is not kept; only data that is needed should be held.
- Data is accurate and kept up to date, and is not kept longer than it is needed. Personal data should be accurate, and if it is not, should be corrected. Data no longer needed will be shredded or securely disposed of.
- Data is processed in accordance with the rights of the individuals. Individuals must be informed, upon request, of all the person information held about them.
- Data is kept securely. There should be protection against unauthorised or unlawful processing and against accidental loss, destruction or damage.

3. Storing data

The Trustees, elected officers of Egmonton Village Meeting and appointed sub committees recognise their responsibility to be open with people when taking personal details from them. This means that elected officers, and co-opted others¹, must be honest about why they want a particular piece of personal information.

The Trustees, elected officers of Egmonton Village Meeting and appointed sub committees may hold personal information about individuals, such as their names, addresses, email addresses and

¹ 'Co-opted others' are parish residents who have been requested by elected officers of the Village to undertake tasks on the Village's behalf.

telephone numbers. These will be securely kept by the Parish Clerk or co-opted other, and will not be available for public access. All data stored on computers is password protected. Once data is not needed any more, is out of date, or has served its use and falls outside the minimum retention time of the Village document retention policy, it will be shredded or securely deleted from the computer.

4. The right to access data

The Trustees, elected officers of Egmonton Village Meeting and appointed sub committees are aware that people have the right to access any personal information that is held about them. Subject Access Requests (SARs) must be submitted in writing (by hard copy, email or social media). If a person requests to see any data that is being held about them, the SAR response must detail:

- How and to what purpose personal data is processed
- The period Egmonton Village intend to process it for
- Everyone who has access to the personal data

The response must be sent within 30 days and should be free of charge

If a SAR includes personal data of other individuals, Egmonton Village must not disclose the personal information of the other individual unless he/she has been contacted to give permission for their information to be shared with the subject. If not, the other individual's details must be redacted.

Individuals have the right to have their data rectified if it is incorrect, the right to request erasure of the data, the right to request restriction of processing of the data and the right to object to data processing – although rules do apply to those requests. See 'Subject Access Request Procedure' for more details.

5. Confidentiality

The Trustees, elected officers of Egmonton Village Meeting and appointed sub committees must be aware that when complaints or queries are made, they must remain confidential unless the subject gives permission otherwise. When handling personal data, this must also remain confidential.