



PRIVACY NOTICE

Review Date: 15th December 2025

Who we are:

Controller

We are Carharrack Parish Council, a parish council in England.
Contact details:

- Carharrack Parish Council c/o 8 Albion Row, Carharrack, Redruth, TR16 5QW
- Clerk: Mrs Julie Pearson
- Telephone: 07792 164456
- Email: clerk@carharrackparishcouncil.co.uk

1.2. Under the law, we are the “data controller” — that means we decide how and why we process your personal data.

1.3. We do not have a separate Data Protection Officer (DPO). The Clerk is the main contact for all data protection / privacy matters.

1.4. Why we process personal data: to manage and run the Council; to deliver services and communications; to administer responsibilities (e.g. allotments, grants, community services); to meet legal and statutory obligations; and to communicate with residents, staff, councillors, suppliers or contractors as needed.

What personal data we may collect, hold and use

Depending on the nature of our contact or work with you, we may collect and process some or all of the following types of data:

- **Identity data:** name, title, date of birth (if needed), role (e.g. councillor, staff, volunteer, resident, contractor).
- **Contact data:** postal address, email address, telephone number(s).
- **Financial / transactional data:** for example, bank details if you are paid by the Council (e.g. staff salary, allowances), or payment records for services.
- **Council-business data:** data related to services we provide to you — e.g. grant applications, allotment tenancy, community hall bookings, correspondence, requests, complaints, planning consultation responses, permissions, licences, etc.
- **Communications data:** records of correspondence (letters, emails, phone calls) between you and the Council, including notes of meetings, phone-calls or face-to-face discussions (where relevant).
- **Technical data:** only if you use any Council websites or online systems (e.g. via contact forms), which may include IP address, browser type, time and date of access — but only if relevant.

- **Other data:** any additional data you provide to us (for example, in a form, application, consent form) that is necessary for the service or purpose in question.

We do **not** collect more data than we need — only data that is adequate, relevant and proportionate to the purpose for which it is collected, in line with data protection principles.

Legal (lawful) bases for processing your data

Under UK GDPR, we must identify a lawful basis before processing your data. In many cases for a parish council, the lawful bases we rely on include:

- **Public task / legal obligation:** processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority (for example, maintaining the electoral or allotment register, responding to correspondence, recording minutes of council meetings, grant management, licences, etc.).
- **Contract:** where we have a contract with you (for example, staff or contractor employment, service contracts, supply of goods/services).
- **Consent:** in specific circumstances where we ask for your permission (for example to send newsletters, share details with third-party service providers, or marketing/community notices).
- **Legitimate interests:** in limited situations, for example internal record-keeping, communications, necessary administration — but only where your rights and freedoms are not overridden.

Where we rely on consent, you have the right to withdraw consent at any time (see Section 8).

Purpose(s) for which we use personal data, and sharing

We use your personal data for a variety of Council-related purposes, including (but not limited to):

- Administration and delivery of council services (e.g. allotments, community halls, grants, local events).
- Managing staff, councillors, volunteers and contractors (e.g. payroll, appointments, contact lists, correspondence).
- Responding to enquiries, complaints, requests, correspondence, and to provide information, advice or services.
- Meeting legal and statutory obligations, including record-keeping, reporting, audit, financial and governance requirements (e.g. accounting, grant audit, minutes of meetings).
- Communications: sending newsletters, community information, consultation documents, notices, updates — where you have consented or where the law allows.
- Protection of Council assets and management (e.g. management of property, allotments, community facilities, maintenance, bookings).
- Internal record-keeping, monitoring, review, and compliance.

Who we may share data with:

In some cases, we may need to share your personal data with:

- statutory or regulatory bodies (e.g. for audit, regulatory, legal compliance),

- contractors or service providers working on behalf of the Council (e.g. maintenance, IT, professional advisers),
- third-party organisations delivering services in partnership with the Council,
- other public authorities, where required by law, or where there is a legitimate public interest,
- other organisations or individuals, but only with your consent or where law requires or permits such sharing.

If we share data with a third-party service provider (a “data processor”), we will use a formal written agreement to ensure they only process data in accordance with our instructions and the law.

If we foresee a new type of processing or sharing not described in this notice, we will either issue a new privacy notice or obtain your consent, whichever is appropriate — consistent with best practice for parish councils.

Data retention — how long we keep your data

We will retain your personal data only as long as necessary to fulfil the purpose(s) for which we collected it, including any legal, statutory, audit or accounting requirements.

For example:

- Records related to Council meetings, decisions, grants, finances — kept for a minimum of [insert years] (or as required by law or audit requirements).
- Staff, contractor or volunteer records — kept for duration of involvement, plus an appropriate period afterward (for example to deal with any liabilities, claims or enquiries).
- General correspondence, enquiries, requests — retained for a reasonable period after resolution (e.g. six years for liability or audit purposes), unless deletion is requested and lawful.
- Where consent was the basis, data may be erased if consent is withdrawn (unless there is another lawful basis or legal reason to retain).

The Council will maintain a Data Retention & Disposal Schedule, and will review it periodically (at least annually) or whenever our activities or legal obligations change.

Security and data management

We take the confidentiality and security of your personal data seriously. We implement appropriate technical and organisational measures to protect data from unauthorised access, accidental loss, damage or unlawful processing.

Access to personal data is restricted to authorised staff, councillors or contractors, and only on a “need-to-know” basis. Where we engage third-party data processors, we ensure they meet the same security standards and sign formal agreements to safeguard data.

All staff, volunteers, councillors and contractors are expected to comply with the Council’s data protection, confidentiality and records-management policies.

Your rights

Under the Data Protection Legislation, you have various rights regarding your personal data. Subject to certain exemptions and conditions, these include:

- **Right to be informed** — you have the right to know how and why we use your data. That is what this notice is for.
- **Right of access** — you can request a copy of personal data we hold about you (“Subject Access Request”).
- **Right to rectification** — you may ask us to correct inaccurate or incomplete data.
- **Right to erasure (“right to be forgotten”)** — you may request deletion of your personal data in certain circumstances (e.g. if there is no longer a lawful basis to retain it).
- **Right to restrict processing** — you may ask us to limit how your data is used, in certain circumstances.
- **Right to object** — you may object to certain processing, especially around direct marketing or any processing based on legitimate interests.
- **Right to data portability** — you may ask us to transfer the data you provided to another controller where technically feasible (typically where processing is based on consent or contract, and is automated).
- **Right in relation to automated decision-making and profiling** — we do not use your personal data for automated decision-making or profiling.

Requests to exercise your rights are free of charge. We will normally respond **within one month** (28 days) of receiving your request — consistent with UK GDPR.

To make a request, contact:

- Clerk, Carharrack Parish Council — using the contact details above.

If you are unhappy with how we have processed your personal data (or your request), you have the right to lodge a complaint with the supervisory authority:
Information Commissioner’s Office (ICO): Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF — phone 0303 123 1113.

Consent and withdrawal

Where we rely on your consent to process personal data (for example for newsletters, marketing, optional services), we will collect your explicit consent. You may withdraw that consent at any time, without affecting processing that was done before you withdrew it.

If you withdraw consent, we will stop the relevant processing, unless we have another lawful basis to continue.


Changes to this Privacy Notice

We may update this Privacy Notice from time to time (for example if our operations or legal obligations change, or we begin new processing activities). Whenever we do, we will update the “Adopted” date and publish the new version on our website (and make a paper copy available on request).

Other information

- **Children's data:** If we collect personal data about children (e.g. in connection with community services, allotments, youth activities), we will take special care. Where consent is needed, we will seek parental or guardian consent if the child is under the age at which they can legally give consent.
- **Third-country transfers:** If personal data is transferred outside the UK (e.g. to service providers), we will only do so where adequate safeguards are in place — such as standard contractual clauses or other legal protections — to ensure your data remains protected.
- **Record-keeping and audit:** We will maintain an information audit that documents what data we hold, why, where it came from, retention periods, and to whom we share it. This audit will be reviewed at least annually or whenever our services change.

This Notice was adopted on the 15th December 2025 and reviewed at Council Meeting as detailed in meeting point 16 and is not retroactive

Name	Position	Signature	Date
Cllr Bettina Holland	Chairperson		15.12.2025