



DATA PROTECTION POLICY

The Data Protection Policy

Bugbrooke Parish Council recognises its responsibility to comply with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 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. Bugbrooke Parish Council will demonstrate compliance with data protection principles through appropriate policies, procedures, training and record keeping.

Data Controller Contact Details

Bugbrooke Parish Council is the Data Controller.

For all data protection queries, please contact:

Parish Clerk

Bugbrooke Parish Council

Camp Close

Bugbrooke

NN7 3RW

Email: parishclerk@bugbrookeparishcouncil.gov.uk

Data Protection Officer

Bugbrooke Parish Council has appointed a Data Protection Officer provided by NCALC.

Contact:

Northants CALC, PO Box 7936, Brackley, Northamptonshire, NN13 9BY or by electronic mail to: dpo@northantscalc.gov.uk

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. Bugbrooke Parish Council will identify and document a lawful basis for processing personal data under Article 6 of the UK GDPR. Bugbrooke Parish Council primarily processes personal data under the lawful basis of **public task** and **legal obligation**, and will identify and document the appropriate lawful basis for each processing activity. Where Bugbrooke Parish Council processes special category data (e.g. health information), it will identify an additional lawful basis under Article 9 of the UK GDPR and ensure appropriate safeguards are in place. The GDPR applies to anyone holding personal information about people, electronically or on paper. Bugbrooke Parish Council is registered with the Information Commissioner's Office (ICO) as a data controller.

When dealing with personal data, Bugbrooke Parish Council is the Data Controller for the personal data it processes. Bugbrooke Parish Council staff and Councillors must ensure that:

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- **Data is processed fairly, lawfully and in a transparent manner**

This means that personal information should only be collected from individuals if staff have been open and honest about why they want the personal information.

- **Data is processed for specified purposes only**

This means that data is collected for specific, explicit and legitimate purposes only.

- **Data is relevant to what it is needed for**

Data will be monitored so 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, if it is not it should be corrected. Data no longer needed will be shredded or securely disposed of.

- **Data is processed in accordance with the rights of individuals**

Individuals must be informed, upon request, of all the personal information held about them.

- **Data is kept securely**

There should be protection against unauthorised or unlawful processing and against accidental loss, destruction or damage.

Storing and accessing data

Bugbrooke Parish Council recognises its responsibility to be open with people when taking personal details from them. This means that staff must be honest about why they want a particular piece of personal information. Bugbrooke Parish Council will provide a Privacy Notice explaining how personal data is used, the lawful basis for processing, data retention periods, and individuals' rights. This will be made available on the Council's website and upon request.

Bugbrooke Parish Council may hold personal information about individuals such as their names, addresses, email addresses and telephone numbers. These will be securely kept at the Bugbrooke Parish Council Office and are not available for public access. All data stored on the Bugbrooke Parish Council Office computers are password protected. Personal data will be retained in accordance with the Council's Document Retention Policy, which sets out retention periods based on legal and operational requirements.

Bugbrooke Parish Council is aware that people have the right to access any personal information that is held about them. Subject Access Requests (SARs) can be made verbally or in writing (including email). 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 Bugbrooke Parish Council tend to process it for
- Anyone who has access to the personal data

The response must be sent within one calendar month. The Council may extend the response period by up to two further months where requests are complex or numerous. It should be free of charge. The Council will verify the identity of the requester before disclosing information.

If a SAR includes personal data of other individuals, Bugbrooke Parish Council must not disclose the personal information of the other individual. That individual's personal information may either be redacted, or the

individual may be contacted to give permission for their information to be shared with the Subject. Individuals also have the right to data portability.

Individuals have the right to lodge a complaint with the Information Commissioner's Office (ICO) if they are unhappy with how their data is handled. Visit: <https://ico.org.uk/global/contact-us/contact-us-public/>

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.

Please see 'Subject Access Request Procedure' for more details.

Data Breaches

Bugbrooke Parish Council will ensure that any personal data breach is recorded and, where required, reported to the ICO within 72 hours. Serious breaches may also be communicated to affected individuals. See 'Data Breach Policy' for more details.

Confidentiality

Bugbrooke Parish Council members and staff must be aware that when complaints or queries are made, they must remain confidential unless disclosure is required by law or the individual has given consent. When handling personal data, this must also remain confidential.

Signed _____ Chair 11th May 2026