

CLIFTON UPON DUNSMORE PARISH COUNCIL

GENERAL DATA PROTECTION REGULATION INTERNAL REGISTER OF DATA PROCESSING ACTIVITIES

PERSONAL DATA	FORMAT	SOURCE OF DATA AND NATURE AND TYPE OF PROCESSING	LAWFUL BASIS FOR PROCESSING DATA	INFORMATION SHARED WITH	
Names, addresses contact details and images of all Members and former Members	Paper and excel spreadsheet	Application form submitted and Declaration of Members interests completed at first meeting. Retained for official records, communication and consultation.	D	General public (via website) Borough Council	To be deleted and disposed of in accordance with document retention and disposal policy 18 months after individual ceases to be a Member
Names, addresses, contact details and NI numbers of all staff and former staff	Paper and excel spreadsheet	Job Application form submitted retained for official records.	D	Payroll Bureau and HMRC	Records of former staff to be deleted and disposed of in accordance with document retention and disposal policy after 12 years
Names, addresses and contact details of all Allotment holders	Paper and excel spreadsheet	Email or postal applications recorded and stored for official records, communication and consultation.	D	N/A	To be deleted and disposed of in accordance with document retention and disposal policy after 6 years
Names, addresses and contact details of Secretaries of Football Teams	Paper and excel spreadsheet	Email or postal applications recorded and stored for official records, communication and consultation	D	N/A	To be deleted and disposed of in accordance with document retention and disposal policy after 6 years
Names, addresses and contact details of all Grazing tenants	Paper contract and PDF	Email or postal applications recorded and stored for official records, communication and consultation	C	N/A	To be kept indefinitely
Community Volunteers	Excel spreadsheet	Email applications recorded and stored for official records, communication and consultation	A	N/A	To be deleted in accordance with document retention and disposal policy after 2 years
Stallholders	Excel spreadsheet	Email or postal applications recorded and stored for official records, communication and consultation	C	N/A	To be deleted in accordance with document

					retention and disposal policy after 2 years
List of attendees at events	Excel spreadsheet	Recorded and stored for communication and consultation	A	N/A	To be deleted in accordance with document retention and disposal policy after 1 year
Survey responders	Excel spreadsheet	Responses via Survey Monkey software and email recorded and stored for communication and consultation	B	N/A	To be deleted in accordance with document retention and disposal policy after 5 years
Names and contact details of all Community organisations / partners	Paper and excel spreadsheet	Email or postal correspondence recorded and stored for communication and consultation	A	Other community partners	To be deleted in accordance with document retention and disposal policy after 2 years
Names and contact details of all Correspondents	Paper	Email, telephone or postal correspondence recorded and stored for communication and consultation	B	Other relevant public bodies	To be deleted in accordance with document retention and disposal policy after 2 years
Names, addresses and contact details of all Complainants	Paper and excel spreadsheet	Email, telephone or postal correspondence recorded and stored for official record, communication and consultation	B	Other relevant public bodies	To be deleted in accordance with document retention and disposal policy 5 years after closure of case
Names and contact details of all Conservation group volunteers	Excel spreadsheet	Recorded and stored for communication and consultation	A	N/A	To be deleted in accordance with document retention and disposal policy after 2 years
Quotations and tenders	Paper	Email or postal responses recorded and stored for official record.	D	N/A	To be kept indefinitely
Accident records	Accident Record book and paper copies of any information submitted.	Email, telephone or postal notifications recorded and stored for official records and communication.	D	Insurance provider	To be deleted in accordance with document retention and disposal policy after 25 years

Grant applications	Paper contract and PDF	Email or postal applications recorded and stored for official records and communication	D	N/A	To be kept indefinitely
Invoices	Excel spreadsheet and paper copies	Email or postal invoices submitted recorded and stored for official records and communication.	D	Internal Auditor	To be deleted and disposed of in accordance with document retention and disposal policy after 6 years
Receipts	Excel spreadsheet and receipt book	Recorded and stored for official records and communication.	D	Internal Auditor	To be deleted and disposed of in accordance with document retention and disposal policy after 6 years

The six lawful bases for processing personal data under the GDPR are:

A. Consent

- A controller must be able to demonstrate that consent was given. Transparency is key: consents given in written declarations which also cover other matters must be clearly distinguishable, and must be intelligible, easily accessible and in clear and plain language.
- Consent is defined as any freely given, specific, informed and unambiguous indication of the data subject's wishes – either by a statement or by a clear affirmative action.

B. Legitimate interests

- This involves a balancing test between the controller (or a third party's) legitimate interests and the interests or fundamental rights of and freedoms of the data subject – in particular where the data subject is a child. The privacy policy of a controller must inform data subjects about the legitimate interests that are the basis for the balancing of interests.

C. Contractual necessity

- Personal data may be processed if the processing is necessary in order to enter into or perform a contract with the data subject (or to take steps prior to entering into a contract).

D. Compliance with legal obligation

- Personal data may be processed if the controller is legally required to perform such processing e.g. complying with the requirements of legislation.

E. Vital Interests

- Personal data may be processed to protect the 'vital interests' of the data subject e.g. in a life or death situation it is permissible to use a person's medical or emergency contact information without their consent.

F. Public Interest

- Personal data may be processed if the processing is necessary for the performance of tasks carried out by a public authority or private organisation acting in the public interest.

Which lawful bases apply to councils?

- (b) As set out above, for most councils a number of different lawful bases will apply at the same time. Often councils will be performing a task in the public interest, under a legal obligation e.g. processing data in the exercise of a statutory power and sometimes as a result of contractual necessity.