

# **LLANSANTFFRAID AND DEYTHEUR COMMUNITY COUNCIL PERSONAL DATA MANAGEMENT POLICY**

The GDPR places a much greater emphasis on transparency, openness and fairness than previous legislation required. The Community Council as Data Controller will ensure the Principles of Data Protection legislation will be followed in the management of personal data and that employees and councillors understand the requirements of the new legislation. The Clerk (as Data Processor) will follow the underlying principles that personal data:

- (a) Must be processed lawfully, fairly and transparently.
- (b) Is only used for a specific processing purpose that the data subject has been made aware of and no other, without further consent.
- (c) Should be adequate, relevant and limited i.e. only the minimum amount of data should be kept for specific processing.
- (d) Must be accurate and where necessary kept up to date.
- (e) Should not be stored for longer than is necessary, and that storage is safe and secure.
- (f) Should be processed in a manner that ensures appropriate security and protection.

The Clerk will manage subject access requests allowing data subjects to exercise their rights under the GDPR:

The right to access personal data we hold on you

The right to correct and update the personal data we hold on you

The right to have your personal data erased

The right to object to processing of your personal data or to restrict it to certain purposes only

The right to data portability

The right to withdraw your consent to the processing at any time for any processing of data to which consent was obtained

The right to lodge a complaint with the Information Commissioner's Office.

The Council, as Data Controller, has adopted a Privacy Policy and Subject Access Request Policy. These, together with the Privacy Notice, are available to view on the Community Council website or via the Clerk.

The Clerk, as Data Compliance Officer will

- Ensure that data is held securely, password controlled on a need to know basis and back-up systems are in place
- Maintain a processing log of data
- Ensure that data is held no longer than is necessary and follows guidelines for its deletion

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- Ensure that Consent Forms are obtained where necessary, recorded and reviewed as necessary
- Undertake data protection impact assessments where required for new projects as directed by the Council as Data Controller and advice of the DPO.
- Ensure the notification of personal data breaches in consultation with the DPO and the Council's Security Incident Response Policy.
- In consultation with the DPO, report to Council on progress in compliance with GDPR to include any required monitoring identified.