



Data Protection Policy

1. Introduction

Upton Parish Council ("the Council") is committed to protecting and respecting the privacy of individuals and to ensuring that personal data is handled in accordance with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018. This policy outlines the Council's approach to data protection and the steps taken to comply with legal requirements.

2. Definitions

- **Personal Data:** Any information relating to an identified or identifiable natural person.
- **Data Controller:** The entity that determines the purposes and means of processing personal data.
- **Data Processor:** The entity that processes personal data on behalf of the Data Controller.
- **Data Subject:** The individual to whom the personal data relates.

3. Principles of Data Protection

The Council will adhere to the following principles when processing personal data:

1. **Lawfulness, Fairness, and Transparency:** Personal data shall be processed lawfully, fairly, and in a transparent manner.
2. **Purpose Limitation:** Personal data shall be collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
3. **Data Minimisation:** Personal data shall be adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed.
4. **Accuracy:** Personal data shall be accurate and, where necessary, kept up to date.

5. **Storage Limitation:** Personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the data is processed.
6. **Integrity and Confidentiality:** Personal data shall be processed in a manner that ensures appropriate security, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage.

4. Data Subject Rights

Data subjects have the following rights regarding their personal data:

- **Right to be Informed:** Data subjects have the right to be informed about the collection and use of their personal data.
- **Right of Access:** Data subjects have the right to access their personal data.
- **Right to Rectification:** Data subjects have the right to have inaccurate personal data rectified.
- **Right to Erasure:** Data subjects have the right to have their personal data erased.
- **Right to Restrict Processing:** Data subjects have the right to request the restriction or suppression of their personal data.
- **Right to Data Portability:** Data subjects have the right to obtain and reuse their personal data for their own purposes across different services.
- **Right to Object:** Data subjects have the right to object to the processing of their personal data in certain circumstances.
- **Rights in Relation to Automated Decision Making and Profiling:** Data subjects have the right not to be subject to a decision based solely on automated processing, including profiling.

5. Data Security

The Council will ensure that appropriate technical and organisational measures are in place to safeguard personal data. This includes protecting personal data against unauthorised access, accidental loss, destruction, or damage.

6. Data Breaches

In the event of a data breach, the Council will promptly assess the risk to data subjects and take steps to mitigate any potential harm. If necessary, the Council will report the breach to the Information Commissioner's Office (ICO) and notify affected data subjects.

7. Data Retention

Personal data will be retained only for as long as necessary to fulfil the purposes for which it was collected. The Council will regularly review data retention periods to ensure compliance with legal requirements.

8. Third-Party Processing

The Council may engage third-party processors to handle personal data on its behalf. Any such processing will be governed by a written contract that ensures the third party processes personal data in accordance with GDPR requirements.

9. Policy Review

This Data Protection Policy will be reviewed annually or as required to ensure it remains compliant with applicable laws and best practices.

10. Contact Information

For any questions or concerns about this policy or the Council's data protection practices, please contact The Clerk clerk@upton-pc.gov.uk

Adopted: January 2025

Review: February 2026