

PRIVACY NOTICE - GUIDANCE NOTES:

What is a Privacy Notice?

A privacy statement or notice describes what, how and why personal data are collected and used. The GDPR sets out more specific requirements than the Data Protection Directive 1995 (as set out in the DPA 1998).

A “generic” suggested format for a Privacy Notice is attached with areas highlighted in red that need to be adapted to suit the specific purposes of the Privacy Notice.

The Contents of a GDPR-ready Privacy Notice

A privacy notice is the conduit through which a data controller communicates its privacy practices to its users, customers and clients.

If any service areas across the Council are using consent as the lawful condition for processing for marketing, their privacy notices should be the foundation or evidence of informed consent (but not the mechanism to capture consent).

Articles 13 and 14 of the GDPR set out the content that must be included in a privacy notice and when this information has to be communicated. GDPR-ready privacy notices must include the following:

- **Data controller's identity** - the generic notice confirms the data controller name in the heading.
- **What personal data are collected** - this is dealt with under the heading “what type of personal information are you processing?”
- **How personal data are collected** - this is dealt with under the heading “where do you get my personal information from?”
- **Why personal data are collected** - this is dealt with under the heading “why are you processing my personal information?”
- **When personal data are shared** - this is dealt with under the heading “do you share my personal information with anybody else?”
- **When personal data are transferred outside the European Economic Area (“EEA”)** - this is dealt with under the heading “do you transfer my personal information to other countries?”
- **What choices individuals have** - this is dealt with under the heading “what we ask of you”.
- **How long personal data are kept** - this is dealt with under the heading “how long do you keep my personal information?”

- **What rights individuals have** - The privacy notice must bring the rights afforded to individuals to their attention. It is insufficient to merely list these rights and that is why space has been left for the contact details of the Data Protection Officer.

How to Present Your GDPR-ready Privacy Notice

The core principles of fairness and transparency under the GDPR mean more than simply including certain prescribed information; presentation is also key. In short, GDPR-ready privacy notices must not bury important information in long, difficult to navigate text, or neglect to include relevant information.

The privacy notice must be provided in a “**concise, transparent, intelligible and easily accessible form, using clear and plain language**”. In short, GDPR-ready privacy notices must not bury important information in long, difficult to navigate text, or neglect to include relevant information.

To make sure the privacy notice is easily understood you should consider:

- **The Language of the Notice**

The language of the privacy notice should be easily understandable for an individual with no background in privacy or law: this is especially the case where the target audience is children. There should be no technical and legal jargon and long sentences with multiple clauses should be avoided. Have you considered whether you have any non-English speaking users and if you need a separate privacy notice for this?

- **The Format of the Privacy Notices**

A short form version of the privacy notice could be displayed to all individuals, including a link to the full version and the relevant sub-sections. This would allow people to follow links to the areas of most interest or concern to them and avoid a situation where the notice is so long, people do not read to the end of the document or understand the information that relates to their privacy. The ICO Guidance recommends a layered approach that is the use of short notices containing key privacy information that have additional layers of more detailed information when required.

The notice should also be formatted in such a way that lends itself to printing.

You should also take into consideration that a web based privacy notice is not the only method of communicating privacy information. You could, for example, have hard copies sent out with promotional literature, in community newsletters or stated orally over the telephone when people interact with the Council.

When Should a Privacy Notice be Provided?

Most organisations provide individuals with the required information at the time of the first communication with the individual, and this is the recommended approach.

However, individuals must, at a minimum, be provided with the required information about the processing of their personal data within a reasonable time (not exceeding one month) after collecting the information.

Where a data controller has not received personal data directly from the individual, they must either:

- make and record their assessment that either: (a) the individual already has the information required to be in a privacy notice, or (b) the provision of such information would be impossible or would involve disproportionate effort; or
- within a reasonable timeframe, provide the individual with the information required to be in a privacy notice. This should also include information on the source of the personal data (including, for example, if it came from a publicly available source).

Further information on Privacy Notices can be found on the Staff Portal (under “Information Governance”/“General Data Protection Regulation”) as follows:

- [GDPR Guidance Note 4 – Privacy Notices](#)
- [GDPR Guidance Note 4 – Privacy Statements Examples](#)
- [ICO Privacy Notices, Transparency and Control](#)
- [ICO Privacy Notice Checklist](#)

You can find out more about us at www.causewaycoastandglens.gov.uk

Data Controller Name: Causeway Coast and Glens Borough Council
Address: 66 Portstewart Road, Coleraine,
Telephone: 028 7034 7034
E-mail: info@causewaycoastandglens.gov.uk

PRIVACY NOTICE

This privacy notice is to let you know how the Democratic Services department of Causeway Coast and Glens Borough Council will look after your personal information.

Our Standards:

The processing of personal data is governed by the Data Protection Act (DPA) and other relevant legislation. When we ask you for personal information, we will ensure that:

- you know why we need it
- we only ask for what we need and don't collect too much or irrelevant information
- we protect your information and make sure nobody has access to it who shouldn't have
- we only share it with other organisations when it is lawful to do so
- we don't keep it any longer than is necessary
- it is not made available for commercial use without your permission

Why Are You Processing My Personal Information?

The Local Government Act (Northern Ireland) 2014 S47 (1) states that *'so far as is reasonably practicable a council must make an audio recording of so much of any meeting of the council which is open to the public at the offices of the council until the expiration of the period of six years from the date of the meeting and published on the council website until the expiration of the period of two years from the date of the meeting.'*

This provision does not apply in relation to meetings of any committee. However, Council has resolved that it is in the public interest in terms of accessibility to the democratic decision making process to audio record its Committee meetings in addition to the Council meeting (including confidential sessions) with the exception of the Planning Committee. The audio recordings of the public sessions will be published on Council's website for the same period as stated above.

We will use your personal information to

- To facilitate your attendance at a council or committee meeting.
- To notify you about arrangements for your attendance.
- To answer any of your questions in relation to the meeting.
- On Council's website as part of the audio recording of the council or committee meeting.

What Type of Personal Information Are You Processing?

The personal information we may gather and use includes name, contact details, e-mail address, IP address and voice/audio. We will also use and store sound recordings and information pertaining to you contained in them for publishing on council's website or for the production of minutes.

Where Do You Get My Personal Information From?

We receive information about you from you yourself when you partake in the online meeting.

Do You Share My Personal Information With Anyone Else?

Your information will be held by the Democratic Services section of Causeway Coast and Glens Borough Council

We may share your information with internal Council Departments, for example ICT in order to facilitate your attendance at a meeting and on Council's website on the published audio recording of the public session of the council or committee meeting you attended. We share your information with others attending the meeting to enable you to join the meeting if you are attending remotely.

We may also provide your information to our suppliers to enable us to deliver this service.

We will not disclose any of your personal information to any other organisation unless required to do so by law.

Include a section here if your service is required to keep a Public Statutory Register(s)

The Public Statutory Register

N/A

Do You Transfer My Personal Information To Other Countries?

No

How Long Do You Keep My Personal Information?

We will only retain your personal information for the period specified in Council's Retention and Disposal Policy.

All information stored is subject to and is kept in line with the Council's Retention and Disposal Schedule (insert hyperlink to <https://www.causewaycoastandglens.gov.uk/council/access-to-information>).

We may also keep it for longer in order to meet other legislative requirements, or to answer requests for information from ongoing or impending statutory inquiries.

What Rights Do I Have?

- You have the right to be informed that your information is being processed
- You have the right to obtain access to your personal information
- You can have your personal information rectified if it is inaccurate or incomplete
- You can ask for your personal information to be erased (where there is no compelling reason for its continued processing)
- You have the right to restrict processing in certain circumstances
- You have the right to object to the processing of personal information.

For further information on your rights, please contact the Council's Data Protection Officer:

Data Protection Officer: Elizabeth Beattie

Telephone:

Email: Elizabeth.beattie@causewaycoastandglens.gov.uk

What We Ask of You

- Please make sure that any information you give us is as accurate and as complete as possible.
- Don't include personal information about another person (including your family members) unless you have told the individual concerned and they agree to it being supplied to us.
- Tell us as soon as possible if any of the personal information you have provided changes.

How Do I Complain If I'm Not Happy?

If you are unhappy with any aspect of how your personal information is being processed, please contact the Council's Data Protection Officer:

Data Protection Officer: Elizabeth Beattie

Telephone:

Email: Elizabeth.beattie@causewaycoastandglens.gov.uk

Your complaint will be dealt with using the Council's complaints process - further details on this can be found at

<https://www.causewaycoastandglens.gov.uk/council/comment-compliments-and-complaints>

If you are still not happy, you have the right to complain to the Information Commissioner's Office (ICO) – contact details are given below:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Tel: 0303 123 1113

Email: casework@ico.org.uk

<https://ico.org.uk/global/contact-us/>

Information Security

Any information carried over the Internet is not secure; information can be intercepted, lost, redirected, changed and read by other people. Any transmission is at your own risk.

Once we have received your information, we will use strict procedures and security features to mitigate unauthorised access and protect your personal data against unlawful processing, accidental loss, destruction and damage. We will retain your information in accordance with our Retention and Disposal Schedule.

We have implemented security policies, controls and technical measures to protect the personal data that we have under our control from:

- unauthorised access
- improper use or disclosure
- unauthorised modification
- unlawful destruction or accidental loss

All our employees, processors and sub processors who have access to and are associated with the processing of personal information, are obliged to ensure compliance with the Data Protection Act.

Further Information

For further information on how your personal information is used, how we maintain the security of your information and your rights to access information that we hold on you, please contact us using our secure online contact form (insert hyperlink to <https://www.causewaycoastandglens.gov.uk/contact-us>).

Or you can call us on 028 7034 7034 or e-mail info@causewaycoastandglens.gov.uk