

ONE VOICE WALES DATA PRIVACY POLICY

(August 2018)

Introduction and Background

This policy is a statement by One Voice Wales of how it seeks to fulfil its obligations under the General Data Protection Regulation (GDPR) and Data Protection Act 2018 in relation to privacy in respect of personal data. It is to be read in conjunction with the One Voice Wales Data Protection Policy and the One Voice Wales Privacy Notices, which outline in detail how personal data will be used and what rights all data subjects have. (One Privacy Notice covers the general public, while the other is for One Voice Wales staff and key role holders.)

Your personal data – what is it?

“Personal data” is any information about a living individual which allows them to be identified from that data (for example a name, photographs, videos, email address or home address). Identification can be by these items of personal data alone or in conjunction with any other personal data. The processing of personal data is governed by legislation relating to personal data which applies in the United Kingdom including the General Data Protection Regulation (the “GDPR”) and other local legislation relating to personal data and rights such as the Human Rights Act.

General information

This Privacy Policy is provided to you by One Voice Wales, which is the data controller for your data. The One Voice Wales address for correspondence is 24c College Street, Ammanford, Carmarthenshire, SA18 3AF.

[Some personal data is collected from the One Voice Wales website; the website address is <http://www.onevoicewales.org.uk/OVWWeb/Default.aspx>]

Data controllers

A data controller is a person or organisation who determines the how and what of data processing (for example, an organisation such as One Voice Wales), and data controllers have a number of important obligations by law in respect of personal data.

Some organisations have joint controller arrangements with other organisations. [One Voice Wales has no such joint controller arrangements]

Organisations may also have other data controllers to whom they pass certain items of personal data, for example, the Welsh Government, local unitary authorities, member councils, contractors or credit reference agencies. [One Voice Wales has no such arrangements with other data controllers].

What personal data is collected?

Different categories of personal data are collected by One Voice Wales, as follows:

Names, titles, aliases, photographs.

Contact details such as telephone numbers, addresses and email addresses.

Where they are relevant to the services provided by One Voice Wales, or where you provide them to us, we may process demographic information such as gender, age, marital status, nationality, education/work histories, academic/professional qualifications, hobbies, family composition, and dependants;

Where you pay for, or are paid for, any services, events or activities, financial identifiers such as bank account numbers, payment card numbers, payment/transaction identifiers, policy numbers and claim numbers.

[The data we process may include sensitive personal data or other special categories of data such as racial or ethnic origin, mental and physical health, details of injuries, medication/treatment received, political beliefs, trade union affiliation, genetic data, biometric data, data concerning sex life or sexual orientation];

[In relation to personal data collected via the One Voice Wales website, this data could include activity information (including user behaviour data), for example, information from synching with other software or services, interaction with social media (functional and/or marketing), information about payments, access to social media profiles and demographic information];

[In relation to information collected automatically from use of the service, this could include device information (providing the nature of the device and/or identifiers), log information (including IP address), location information (and, possibly, how this location is collected/inferred), device sensor information, the previous site visited, the browser type and/or Operating System and any interaction with email messages];

[Information from other sources, which could include referral or recommendation programmes and/or publicly accessible sources].

[Information from cookies or similar technologies (incl. in-app codes) (including whether session or persistent), which could include essential login/authentication or navigation, functionality (remembered settings), performance and analytics (including user behaviour data), advertising or retargeting data and any third party software served on users];

[The nature of any outbound communications with website users, including email, telephone (voice) and telephone (text) data.]

Compliance with data protection law

One Voice Wales will comply with data protection law. This says that the personal data we hold about you must be:

used lawfully, fairly and in a transparent way.
collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
relevant to the purposes we have told you about and limited only to those purposes.
accurate and kept up to date.
kept only as long as necessary for the purposes we have told you about.
kept and destroyed securely including ensuring that appropriate technical and security measures are in place to protect your personal data to protect personal data from loss, misuse, unauthorised access and disclosure.

Use of personal data

We use your personal data for some or all of the following purposes:

to deliver services, which includes understanding your needs, to provide the services that you request and to understand what we can do for you and to inform you of other relevant services.
to confirm your identity to provide some services.
to contact you by post, email, telephone or using social media (including Facebook, Twitter, WhatsApp).
to help us to build up a picture of how we are performing.
[to prevent and detect fraud and corruption in the use of public funds and, where necessary, for law enforcement functions;]
[to enable us to meet all legal and statutory obligations and powers including any delegated functions;]
to carry out comprehensive safeguarding procedures (including due diligence and complaints handling) in accordance with best safeguarding practice from time to time with the aim of ensuring that all children and adults-at-risk are provided with safe environments and generally as necessary to protect individuals from harm or injury;
to promote the interests of One Voice Wales.
to maintain our own accounts and records.
to seek your views, opinions or comments.
to notify you of changes to our activities, services, events, staff and role holders.
to send you communications which you have requested and that may be of interest to you (these may include information about campaigns, appeals, other new projects or initiatives).
to process relevant financial transactions including grants and payments for goods and services supplied.
to allow the statistical analysis of data so that we can plan the provision of services.

[Our processing may also include the use of CCTV systems for the prevention and prosecution of crime.]

What is the legal basis for processing your personal data?

One Voice Wales is an organisation that works for and supports community and town councils across Wales. Most of your personal data is processed in a way that complies with the requirements of our member councils. Sometimes it is necessary to process the personal data of people using One Voice Wales services. We will always take into account your interests and rights. This Privacy Policy sets out your rights and the obligations of One Voice Wales to you in detail.

[We may also process personal data if it is necessary for the performance of a contract with you, or to take steps to enter into a contract.]

Sometimes the use of your personal data requires your consent. We will first obtain your consent to that use.

Sharing your personal data

One Voice Wales will implement appropriate security measures to protect your personal data. This section of the Privacy Policy provides information about the third parties with whom One Voice Wales will share your personal data. These third parties also have an obligation to put in place appropriate security measures and will be responsible to you directly for the manner in which they process and protect your personal data. It is likely that we will need to share your data with some or all of the following (but only where necessary):

our agents, suppliers and contractors – for example, we may ask a commercial provider to publish or distribute newsletters on our behalf, or to maintain our database software.

on occasions, the Welsh Government, local unitary authorities, member councils, other organisations or bodies with which we are carrying out joint ventures, contractors or credit reference agencies.

[One Voice Wales currently has no joint controller arrangements] or [The current details of the joint controller arrangements for One Voice Wales (including details about the relevant data) are ...]

[One Voice Wales currently has no arrangements with other data controllers] or [The current details of the other data controllers relevant to One Voice Wales (including details about the relevant data) are ...]

How long do we keep your personal data?

We will keep some records permanently if we are legally required to do so. We may keep some other records for an extended period of time. For

example, it is current best practice to keep financial records for a minimum period of 8 years to support HMRC audits or provide tax information. One Voice Wales is permitted to retain data in order to defend or pursue claims, and in some cases the law imposes a time limit for such claims. We will retain some personal data for this purpose as long as we believe it is necessary to be able to defend or pursue a claim. In general, we will endeavour to keep data only for as long as we need it. This means that we will delete it when it is no longer needed.

[Further details relating to the retention of data is contained in the One Voice Wales Data Retention Policy.]

Your rights and your personal data

You have the following rights with respect to your personal data:

(When exercising any of the rights listed below, in order to process your request, we may need to verify your identity for your security. In such cases we will need you to respond with proof of your identity before you can exercise these rights.)

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 at any time to the processing of data to which consent was obtained

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

You can contact the Information Commissioners Office on 0303 123 1113 or via email at <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

Transfer of Data Abroad

Any personal data transferred to countries or territories outside the European Economic Area ("EEA") will only be placed on systems complying with measures giving equivalent protection of personal rights either through international agreements or contracts approved by the European Union. [Our website is also accessible from overseas so on occasion some personal data (for example in a newsletter) may be accessed from overseas.]

Further processing

If we wish to use your personal data for a new purpose, not covered by this Privacy Policy, then we will provide you with a Privacy Notice explaining this

new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

Changes to this policy

We keep this Privacy Policy and our Privacy Notices under regular review, and we will place any updates on the One Voice Wales website - <http://www.onevoicewales.org.uk/OVWeb/Default.aspx> [This Policy was last updated in [August 2018].

Contact Details

Please contact One Voice Wales if you have any questions about this Privacy Policy or the personal data we hold about you, or to exercise all relevant rights, queries or complaints.

The One Voice Wales address for correspondence is 24c College Street, Ammanford, Carmarthenshire, SA18 3AF or admin@onevoicewales.wales