

# Stone

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## Town Council



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## Data Protection Policy

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March 2026

# Contents

1	Personal Data – What is it? .....	3
2	Council Information .....	3
3	Who are the Data Controllers?.....	3
4	What Personal Data is Collected? .....	3
5	Data Protection Law .....	5
6	Use of Personal Data .....	5
7	What is the legal basis for processing personal data? .....	6
8	Sharing Personal data.....	7
9	How long do we keep personal data? .....	7
10	Rights of Data Subjects .....	7
11	Transfer of Data Abroad .....	8
12	Further Processing.....	8
13	Changes to this Policy.....	8
14	Contact Details .....	9

## 1 PERSONAL DATA – WHAT IS IT?

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- 1.1 “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 address). Identification can be by the 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.

## 2 COUNCIL INFORMATION

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- 2.1 This Data Protection Policy has been produced by Stone Town Council.
- a. Website: [www.stonetowncouncil.gov.uk](http://www.stonetowncouncil.gov.uk)
  - b. Address: 15 Station Road, Stone, ST15 8JP

## 3 WHO ARE THE DATA CONTROLLERS?

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- 3.1 The data controller is Stone Town Council.
- 3.2 The Council may also work with other data controllers such as government agencies, other local authorities, community groups, charities, banks and contractors.

## 4 WHAT PERSONAL DATA IS COLLECTED?

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- 4.1 We may collect data such as:
- a. Names, titles, and aliases, photographs;
  - b. Contact details such as telephone numbers, addresses, and email addresses;
  - c. Where they are relevant to the services provided by a Council, 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;
  - d. Where activities are paid for, such as use of a community centre, financial identifiers such as bank account numbers, payment card

numbers, payment/transaction identifiers, policy numbers, and claim numbers;

- 4.2 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 and sex life or sexual orientation.
- 4.3 Website data – we may collect:
- a. Information from synching with other software or services
  - b. Interaction with social media (functional and/or marketing) and what information is available?
  - c. Information about payments
  - d. Access to social media profiles
  - e. Demographic information
  - f. Data automatically collected from use of the web service:
    - i. Device information (nature of device and/ or identifiers)
    - ii. Log information (including IP address)
    - iii. Location information (how is location collected/inferred)
    - iv. Device sensor information
    - v. Site visited before arriving
    - vi. Browser type and or OS
    - vii. Interaction with email messages
  - g. Information from other sources, for example:
    - i. Referrals or recommendations
    - ii. Publicly accessible sources
  - h. Information from cookies or similar technologies (incl. in-app codes) (including whether session or persistent), for example:
    - i. Essential login/authentication or navigation
    - ii. Functionality – remember settings
    - iii. Performance & Analytics – user behaviour
    - iv. Advertising/retargeting
    - v. Any third party software served on users

- vi. Other
- i. Nature of any outbound communications with website users
  - i. Email
  - ii. Telephone (voice)
  - iii. Telephone (text)

## 5 DATA PROTECTION LAW

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5.1 The Council will comply with data protection law. This says that the personal data we hold must be:

- a. Used lawfully, fairly and in a transparent way.
- b. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- c. Relevant to the purposes we have told you about and limited only to those purposes.
- d. Accurate and kept up to date.
- e. Kept only as long as necessary for the purposes we have told you about.
- f. Kept and destroyed securely including ensuring that appropriate technical and security measures are in place to protect personal data from loss, misuse, unauthorised access and disclosure.

## 6 USE OF PERSONAL DATA

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

- a. To deliver public services including to understand needs, to provide services, to understand needs and to provide information
- b. Confirmation of identity to provide some services
- c. Making contact by post, email, telephone or using social media (e.g., Facebook, Twitter, WhatsApp)
- d. To help us to build up a picture of how we are performing
- e. To prevent and detect fraud and corruption in the use of public funds and where necessary for law enforcement functions

- f. To enable us to meet all legal and statutory obligations and powers including any delegated functions;
- g. 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;
- h. To promote the interests of the Council;
- i. To maintain our own accounts and records;
- j. To seek views, opinions or comments;
- k. To notify residents/service users of changes to our facilities, services, events and staff, Councillors and role holders;
- l. To send communications which have been requested and that may be of interest. These may include information about campaigns, appeals, other new projects or initiatives;
- m. To process relevant financial transactions including grants and payments for goods and services supplied to the Council
- n. To allow the statistical analysis of data so we can plan the provision of services.

6.2 Our processing may also include the use of CCTV systems for the protection of assets, general security, the enforcement of contract terms and the prevention and prosecution of crime.

## 7 WHAT IS THE LEGAL BASIS FOR PROCESSING PERSONAL DATA?

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7.1 The Council is a public authority and has certain powers and duties. Most personal data is processed for compliance with a legal obligation which includes the discharge of the Council's statutory functions and powers. Sometime when exercising these powers or duties it is necessary to process personal data of residents or people using the Council's services. We will always take into account their interests and rights. This Data Protection Policy sets out these rights and the Council's obligations in detail.

7.2 We may also process personal data if it is necessary for the performance of a contract, or to take steps to enter into a contract. An example of this would be processing data in connection with the use of sports facilities, or the acceptance of an allotment tenancy.

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

## 8 SHARING PERSONAL DATA

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- 8.1 The Council will implement appropriate security measures to protect personal data. This section of the Data Protection Policy provides information about the third parties with whom the Council will share personal data. These third parties also have an obligation to put in place appropriate security measures and will be responsible directly for the manner in which they process and protect personal data. It is likely that we will need to share data with some or all of the following (but only where necessary):
- a. 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 computers and software;
  - b. On occasion, other local authorities or other bodies with which we are carrying out joint ventures e.g. in relation to facilities or events for the community.

## 9 HOW LONG DO WE KEEP PERSONAL DATA?

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- 9.1 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. We may have legal obligations to retain some data in connection with our statutory obligations as a public authority. The Council is permitted to retain data in order to defend or pursue claims. In some cases the law imposes a time limit for such claims (for example 3 years for personal injury claims or 6 years for contract 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.

## 10 RIGHTS OF DATA SUBJECTS

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- 10.1 Data subjects are the people from whom the Council collect and hold data. They have the following rights with respect to their personal data:
- a. The right to access personal data we hold on them
  - b. The right to correct and update the personal data we hold on them

- c. The right to have their personal data erased
  - d. The right to object to processing of their personal data or to restrict it to certain purposes only
  - e. The right to data portability
  - f. The right to withdraw their consent to the processing at any time for any processing of data to which consent was obtained
  - g. The right to lodge a complaint with the Information Commissioner's Office.
- 10.2 When exercising any of the rights listed above, the Council will make appropriate ID checks to ensure the security of data. In such cases, data subjects will be required to respond with proof of identity before these rights can be exercised.
- 10.3 The Information Commissioners Office can be contacted on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

## 11 TRANSFER OF DATA ABROAD

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- 11.1 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 may be accessed from overseas.

## 12 FURTHER PROCESSING

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- 12.1 If we wish to use personal data for a new purpose, not covered by this Data Protection Policy, then we will update the Privacy Notice accordingly. If necessary, we will seek prior consent to the new processing.

## 13 CHANGES TO THIS POLICY

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- 13.1 We keep this Data Protection Policy under regular review, and we will place any updates on the Council's website at [www.stonetowncouncil.gov.uk](http://www.stonetowncouncil.gov.uk).

## 14 CONTACT DETAILS

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- 14.1 Data subjects may ask questions about this Data Protection Policy or the personal data we hold about them or they may exercise all relevant rights, queries or complaints by contacting:

The Data Controller, Stone Town Council, 15 Station Road, Stone, ST15 8JP  
Email: [clerk@stonetowncouncil.gov.uk](mailto:clerk@stonetowncouncil.gov.uk), Phone: 01785 619740