



**WOKINGHAM
BOROUGH COUNCIL**

Privacy Notice Information Governance

This notice, in conjunction with Wokingham Borough Councils overarching privacy statement, explains when as a service we collect personal information, what we use your data for, who has access, who we share it with, and what your rights are.

Who are we?

Information Services
Wokingham Borough Council,
Shute End,
Wokingham,
Berkshire,
RG40 1BN

What is the lawful basis for processing the information?

The lawful basis for processing your information is the performance of a public task, and is necessary for compliance with a legal obligation, as specified by the following legislation:

- Freedom of Information Act 2000
- Environmental Information Regulations 2004
- General Data Protection Regulations
- UK Data Protection Act 2018

How do we collect information from you?

Information is collected from you as the service user via online web forms, hard copy documents, e-mail, by telephone or through face-to-face discussion. This information will be collected from either you directly as the data subject, or from a representative acting on your behalf, e.g. a solicitor.

For a request to be valid it must be submitted in writing. Information will be held by other service areas within the Council, which Information Services will retrieve to be able to respond to your request. In the event of a breach, information will be collected from various sources to enable the Data Protection Officer to investigate the incident and reach a conclusion.

What type of information is collected from you?

The service collects and processes a range of information about you. The information is provided to enable Information Services to carry out its duty and functions, provide you with a service, and continue to make service improvements.

We will collect the following information: Surname, Forename, Title, Address, Postcode, E-mail, and Phone number. We may collect Proof of Identity, Proof of address, photograph and signature in the course of verifying your identity for Subject Access. If the request for information falls under a Subject Access then we will collect any other information that you supply us with to help us locate the information you are requesting which may include details of other family members, or if submitting on behalf of another individual we will capture both parties details.

You will be informed of any other data we collect, that is not listed above, orally or through email at the time of collection of the data.

How do we use the information you have provided?

All information provided is used by Wokingham Borough Council for the purposes of:

- Logging your request on our system
- Verifying your identity under Subject Access
- Supplying you with the information that you have requested, or issuing you with a refusal notice
- Monitoring applicants submissions for the purpose of aggregation of requests rule
- Collection of monies owed to us under certain requests
- Investigating and managing security concerns, complaints and breaches
- Informing the Data Protection Officer of any breaches, and any reportable breaches to the Information Commissioners Office (ICO)
- Co-operating with third parties who submit requests under Article 23
- Responding to enquiries and other matters
- Analysing statistical data for service development purposes (usually anonymised)

Who has access to the information about you?

Your information is managed by staff employed in the Information Services and the Data Protection Officer. Your information may also be shared with officers from other service areas for assistance with these matters. All personal data is stored securely; we have in place security measures which are intended to ensure, as far as possible, the security and integrity of all personally identifiable information.

The central team who are responsible for logging and managing requests for the Council has access to this system which is accessed through Usernames and Passwords. The Data Protection Officer, and members of the Data Protection Officers team, will have access to your personal data when there has been a breach to enable them to investigate the breach, report this to the necessary individuals, and to make any changes to processes to prevent a reoccurrence happening.

Your data is stored securely on our systems and accessed only by authorised officers of Wokingham Borough Council by using their own Username and Password all created in-line with pre-defined user credentials. Personal data is also held in electronic files on the Councils network drives. These are only accessible through personal logon credentials and access privileges to specific drives.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our sites, any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access, and any exchanges of information carried out once we are in receipt of your data will be done securely.

Any personal data held in paper format is held in lockable filing storage, and accessed only by authorised officers, as is data held on audio or CD/DVD media. Data may be stored in paper form and is always secured in lockable cabinets when not in use. Access to Council sites is also secure requiring a personal electronic pass (lanyard) to access staff only areas.

Who we may share your information with?

When contacting Information Services to gain access to services, your information will be shared with other Council staff to the extent required to provide you with the service you have requested. In relation to Freedom of Information, Environmental Information Regulations and Subject Access Requests the information may be shared internally with our Shared Legal Services if you have asked for your request to be reviewed.

The Councils Shared Audit and Investigations team may also be provided with personal details of individuals in the course of their duties, however information will be shared on a strict need to know basis. The Council may also share your information with the Information Commissioners Office, and to Tribunal, if they are required to review your request or that you have submitted a complaint to them.

Where the Council engages third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality, and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

To ensure that information is continued to be held securely and that accuracy is maintained, there will also be instances where our system suppliers will need to access individuals personal information. This will be on a strict need to know basis and all contracts have confidentiality clauses built in.

The Council will not transfer your information to countries outside the European Economic Area (EEA) unless this is necessary, and only to countries which have sufficient safeguards in place to protect information.

Wokingham Borough Council may also share personal information with the police and other local authorities under Article 23 of the General Data Protection Regulations in order to prevent or detect crime.

How long do we store your information?

The duration that the Council will hold information, and what happens at the end of that period, are as described within the Councils corporate retention schedule available on our website: www.wokingham.gov.uk/council-and-meetings/information-and-data-protection/privacy-statement

Does the service utilise automated decision-making?

Information Services does not utilise automated decision-making in the services that it provides.