

Privacy Notice (DUAA 2025 Compliant Version) 25th November 2025

This Privacy Notice explains how Windlesham Parish Council collects, uses, and protects personal data in line with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and the Data (Use & Access) Act 2025 (DUAA 2025).

1. Who We Are

Windlesham Parish Council is the data controller responsible for your personal data. Our Data Protection Officer (DPO) is GDPR-Info Ltd – contactable via the Clerk.

2. Lawful Basis for Processing

The Council processes personal data where necessary for the performance of its public duties, to comply with legal obligations, or where processing is required under a contract. As a public authority, the Council generally relies on the legal bases of ‘public task’ and ‘legal obligation’, not ‘legitimate interests’. Where consent is required, it will be requested explicitly.

3. Special Category and Criminal Data

The Council may process special category or criminal conviction data where necessary for legal obligations or public tasks. Such processing is supported by an appropriate policy document in accordance with Schedule 1 of the Data Protection Act 2018.

4. Data Protection Impact Assessments (DPIAs)

The Council undertakes Data Protection Impact Assessments for high-risk processing activities, such as CCTV monitoring, safeguarding procedures, or online data collection, to ensure compliance and protect individuals’ rights.

5. Data Sharing and Processors

Personal data may be shared with approved third parties or contractors only where necessary. All sharing is governed by written Data Sharing Agreements or Processor Contracts in line with UK GDPR and DUAA 2025.

6. Data Security and Breach Management

Appropriate technical and organisational measures are in place to protect personal data, including encryption, access control, and staff training. Any personal data breaches are assessed and, where required, reported to the Information Commissioner’s Office within 72 hours.

7. Automated Decision-Making and AI

The Council does not carry out decision-making based solely on automated processing or AI (artificial intelligence) systems. No automated decisions; human review ensured if used. If this changes in the future such as the introduction of CHAT systems, users will be informed and given the right to request human review.

8. Data Retention

Personal data is retained only for as long as necessary. Retention periods follow the Council's Records Management and Records Retention Schedule, which ensures compliance with statutory and best practice requirements.

9. Your Rights

Individuals and organisations have the right to access, rectify, erase, restrict, or object to processing of their data. You may also request data portability or withdraw consent at any time. Where automated processing occurs, they have the right to human review.

10. Website and Cookies

On the the Council's website, cookies may be used to enhance user experience. Details are available in the Council's separate Cookie Policy, in compliance with the Privacy and Electronic Communications Regulations (PECR).

11. Complaints

If there are concerns about how data is handled, please contact the Council or our DPO via the Clerk. You may also lodge a complaint with the Information Commissioner's Office at www.ico.org.uk or call 0303 123 1113.

12. Review and Updates

This Privacy Notice is reviewed annually or when legislation changes. Last reviewed: October 2025.