



Privacy Notice

Cheshire Association of Local Councils

This privacy notice is intended to inform you of how your personal data will be used in our organisation. We take your data protection rights seriously and we will only use your personal data in the ways we describe here.

1. Who we are and what we do?

- 1.1. We are Cheshire Association of Local Councils an Association of Local Councils in England. Our contact details are Cheshire Association of Local Councils, Park View Business Centre, Combermere, Whitchurch, Shropshire, SY13 4AL, tel: 01948 871314.
- 1.2. We are a data controller for personal data as defined by all applicable data protection and privacy laws including, but not limited to, the retained EU law version of the General Data Protection Regulation ((EU) 2016/679) (the "UK GDPR"), as it forms part of the law of England and Wales, Scotland, and Northern Ireland by virtue of section 3 of the European Union (Withdrawal) Act 2018, the Data Protection Act 2018, the Privacy and Electronic Communications Regulations 2003 as amended, and any successor legislation (the "Data Protection Legislation").
- 1.3. We are not required to have a Data Protection Officer as defined by Article 37 of the UK GDPR.
- 1.4. We process your personal data to enable us to manage our organisation and provide a service to you and others.

2. Your data protection rights

- 2.1. Under the data protection legislation, you have rights including:
 - 2.1.1. Your right to be informed - You have the right to be informed of our use of your personal data. This notice is designed to give you that information. If you require further information please contact us using the details below.
 - 2.1.2. Your right of access - You have the right to ask us for copies of your personal information.
 - 2.1.3. Your right to rectification - You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
 - 2.1.4. Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.
 - 2.1.5. Your right to restriction of processing - You have the right to ask us to restrict the processing of your information in certain circumstances.

- 2.1.6. Your right to object to processing - You have the right to object to the processing of your personal data in certain circumstances.
- 2.1.7. Your right to data portability - You have the right to ask that we transfer the information you gave us to another organisation, or to you, in certain circumstances.
- 2.1.8. Your right in relation to automated decision-making including profiling - We do not process personal data in this way.
- 2.2. You are not required to pay any charge for exercising your rights. If you make a request, the law gives us one month to respond to you but we have undertaken to respond as soon as possible and in any case 28 days.
- 2.3. Please contact us using the details in Section 1 above if you wish to make a request.

3. What data does the data protection legislation cover?

- 3.1. Data protection legislation is to protect the data privacy of individuals and uphold your rights over your own personal data.
- 3.2. Definitions:
 - 3.2.1. Personal Data - means any information relating to an identified or identifiable person ('data subject'); an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person.
 - 3.2.2. Processing - means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
 - 3.2.3. Data Controller - means the person or organisation which, alone or jointly with others, determines the purposes and means of the processing of personal data.
 - 3.2.4. Data Processor - means a person or organisation which processes personal data on behalf of the Data Controller.
 - 3.2.5. Third Country - means a country or territory outside the United Kingdom.
 - 3.2.6. Lawful Basis - means one of the six lawful reasons to process personal data as set out in Article 6 of the UK GDPR. At least one of these will apply whenever we process your personal data.

4. Why do we have your information and how long will we keep it?

- 4.1. We take your data privacy seriously and will only use your personal data for the purpose for which it was collected.
- 4.2. For every activity that we undertake using personal data we must be clear what our purpose is for that activity and have a Lawful Basis to process your data.

- 4.3. Where we process personal data that reveals special category data (article 9 UK GDPR) or personal data relating to criminal convictions and offences (article 10 UK GDPR) we require an additional condition to process.
- 4.4. We collect and process your personal data for the following purposes for which we collect certain categories of data and in order to lawfully process your data for those purposes we rely on these lawful bases and additional conditions.

Purpose	Lawful basis	Additional Condition to Process	Categories of data
Accounts	Contract	N/A	<ul style="list-style-type: none"> • Identity Information • Contact Information • Financial information
Correspondence	Legitimate Interest - specifically to enable general correspondence	N/A	<ul style="list-style-type: none"> • Identity Information, • Contact Information
Governance	Contract	N/A	<ul style="list-style-type: none"> • Identity Information • Contact Information
Guidance	Legitimate Interest - specifically to issue advice and guidance or Consent	N/A	<ul style="list-style-type: none"> • Identity Information • Contact Information
HR	Contract	Employment, social security and social protection	<ul style="list-style-type: none"> • Identity Information • Contact Information • Financial information • Special Category Data
Mailing List	Consent	N/A	<ul style="list-style-type: none"> • Identity Information • Contact Information
Membership	Contract	N/A	<ul style="list-style-type: none"> • Identity Information • Contact Information
Membership Web Access	Consent	N/A	<ul style="list-style-type: none"> • Identity Information • Contact Information
Special Events	Consent	N/A	<ul style="list-style-type: none"> • Identity Information • Contact Information
Suppliers	Contract	N/A	<ul style="list-style-type: none"> • Identity Information • Contact Information
Training and Events	Contract	N/A	<ul style="list-style-type: none"> • Identity Information • Contact Information
Training and Events Feedback	Consent	N/A	<ul style="list-style-type: none"> • Identity Information • Contact Information

4.5. If we have relied on 'consent' to process your personal data, you are able to withdraw that consent at any time and we will be happy to assist you.

4.6. We collect data in the following ways.

Categories of data	How we collect your data
Identity Information	Direct from you or Supplied by your council if one of our members
Contact Information	Direct from you or Supplied by your council if one of our members
Financial information	Direct from you
Special Category Data	Direct from you

4.7. How long we intend to keep your data

Purpose	How long we will keep your data
Accounts	7 years from end of financial year
Correspondence	5 years
Governance	5 years from end of term of office
Guidance	Until unsubscribe
HR	7 years from end of employment
Mailing List	7 years from end of membership
Membership	7 years from end of membership
Membership Web Access	At end of eligibility for web access
Special Events	5 years from event date
Suppliers	7 years from last transaction
Training and Events	5 years from event date
Training and Events Feedback	5 years from event date

4.8. When we no longer need your personal data to undertake our stated purpose we will delete it or anonymise it so that it no longer permits the identification of you.

4.9. Personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with UK GDPR Article 89(1).

- 4.10. In some cases we may be allowed to use your personal data to contact you with news about our activities, products or services. We will always offer an opt out and we will always comply with the data protection legislation.

5. Sharing this information with other data controllers

- 5.1. We may share your data with another data controller if that controller takes over the purpose for which we collected your data.
- 5.2. We may be required to share your personal data for legal, judicial, law enforcement or government reasons.
- 5.3. We routinely share personal data with other data controllers for the following reasons.

Receiving Data Controller	Reason	Data Controller Location
Event Holders	To facilitate events	UK or EU
HMRC	Tax and Payroll	UK
Local Authorities	Advice, guidance and assistance	UK
National Association of Local Councils	Advice, guidance and assistance	UK
Pension Providers	Staff pensions	UK
Trade Unions	Staff	UK
Training Providers	To facilitate training	UK or EU

- 5.4. We may share your personal data with other data controllers to enable us to fulfil our obligations to you or to provide a product or service, in that event we will tell you who we are going to share your data with.
- 5.5. We take your data protection rights seriously and will take steps to ensure that those we share data with process it responsibly.

6. Data processors working on our behalf

- 6.1. We may send your data to a data processor to undertake data processing activities on our behalf.
- 6.2. We send personal data to data processors for the following reasons.

Categories of data processor	Reason	Data Controller Location
IT providers	Backup and file storage	UK
Bulk Mail Providers	Bulk Email	USA
Webhost	Website	UK

7. Where do we store and process your personal data?

- 7.1. Most of your personal data will be stored and processed here in the UK.
- 7.2. Some data may be stored or processed in other third countries. We have made sure that safeguards are in place or such transfers to ensure that an equivalent standard of data protection is in place.

- 7.2.1. Personal data transferred to EU member states, Iceland, Norway, Liechtenstein, Gibraltar, Andorra, Argentina, Faroe Islands, Guernsey, Isle of Man, Israel, Jersey, New Zealand, Switzerland, Uruguay, Japan (only private sector organisations) or Canada (only covers data that is subject to Canada's Personal Information Protection and Electronic Documents Act) is transferred to those third countries on the basis of adequacy regulations.
- 7.2.2. Personal data transferred to USA organisations certified to the the "UK Extension to the EU-US Data Privacy Framework" is transferred on the basis allowed for by Article 45 of the UK General Data Protection Regulation (GDPR).
- 7.2.3. Personal data transferred to other USA organisations and all other countries is transferred on the basis of International Data Transfer Agreements (IDTAs) where there is a contract incorporating an agreement recognised or issued in accordance with the data protection legislation. The IDTA contains contractual obligations on us (the data exporter) and the receiver (the data importer), and rights for the individuals whose personal data is transferred.

8. How to contact us for more information

- 8.1. We hope that you will feel that we have explained our use of your personal data adequately to you, however if you have any questions, wish to exercise any of your data protection rights or have a complaint please contact us at Cheshire Association of Local Councils, Park View Business Centre, Combermere, Whitchurch, Shropshire, SY13 4AL, tel: 01948 871314
- 8.2. You can also complain to the Information Commissioner's Office (ICO) if you are unhappy with how we have used your data. Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF Helpline number: 0303 123 1113

9. Updates to this notice

- 9.1. We might have to make changes to this Privacy Notice if there are changes to how we process your personal data or the data protection legislation changes.
- 9.2. Changes will be made available via updated notices on the Cheshire Association of Local Councils Website and at the Cheshire Association of Local Councils offices at the above address.
- 9.3. This Privacy Notice was last updated on 5th December 2023.