



Town and Manor
of Hungerford

PRIVACY POLICY

Version 2 – 17 July 2018

1. WHO WE ARE

Here at the Town & Manor of Hungerford, we are committed to protecting your personal information and making every effort to ensure that your personal information is processed in a fair, open and transparent manner.

We are a "data controller" for the purposes of the Data Protection Act 1998 and (from 25 May 2018) the EU General Data Protection Regulation 2016/679 ("Data Protection Law"). This means that we are responsible for, and control the processing of, your personal information.

2. HOW WE COLLECT INFORMATION ABOUT YOU

We collect information from you in the following ways:

When you interact with us directly: This could be if you ask us about our activities, organise an event, join our fishery, find out about Commoner rights, purchase something, apply for a job or volunteering opportunity or otherwise provide us with your personal information. This includes when you phone us, visit our website, or get in touch through the post, or in person.

When you visit our website: We gather general information which might include which pages you visit most often and which services, events or information is of most interest to you.

3. INFORMATION WE COLLECT AND WHY WE USE IT

Personal Information

Personal information we collect includes details such as your name, date of birth, email address, postal address and telephone number, as well as information you provide in any communications between us.

We will mainly use this information:

- To provide the services or goods that you have requested.
- To update you with important messages about Commoners rights, events, Hocktide or the fishery.
- To keep a record of your relationship with us.
- Where you volunteer with us, to administer the volunteering arrangement.

If you do not provide this information, we will not be able to process your donation, sign you up for a particular event or provide goods and services you have requested.

4. LEGAL BASIS FOR USING YOUR INFORMATION

In some cases, we will only use your personal information where we have your consent or because we need to use it in order to fulfil a contract with you (for example, because you have placed an order on our website).

However, there are other lawful reasons that allow us to process your personal information and one of those is called 'legitimate interests'. This means that the reason that we are processing information is because there is a legitimate interest for Town & Manor to process your information to help us to achieve our objectives.

Whenever we process your Personal Information under the 'legitimate interest' lawful basis we make sure that we take into account your rights and interests and will not process your personal information if we feel that there is an imbalance.

Some examples of where we have a legitimate interest to process your Personal information are where we contact you about our Hocktide or Court activities, for our legal purposes (for example, dealing with complaints and claims), or for complying with guidance from the Charity Commission.

5. SHARING YOUR INFORMATION

The personal information we collect about you will mainly be used by our staff (and volunteers – primarily committee members or Trustees where necessary).

We will never sell or share your personal information with organisations so that they can contact you for any marketing activities. Nor do we sell any information about your web browsing activity.

Town & Manor may however share your information with our trusted partners and suppliers who work with us on or on our behalf to deliver our services, but processing of this information is always carried out under our instruction. We make sure that they store the data securely, delete it when they no longer need it and never use it for any other purposes.

We enter into contracts with these service providers that require them to comply with Data Protection Laws and ensure that they have appropriate controls in place to secure your information.

Legal disclosure

We may disclose your information if required to do so by law (for example, to comply with applicable laws, regulations and codes of practice or in response to a valid request from a competent authority); or, in order to enforce our conditions of sale and other agreements.

6. KEEPING YOUR INFORMATION SAFE

We take looking after your information very seriously. We've implemented appropriate physical, technical and organisational measures to protect the personal information we have under our control, both on and off-line, from improper access, use, alteration, destruction and loss.

Unfortunately, the transmission of information using the internet is not completely secure. Although we do our best to protect your personal information sent to us this way, we cannot guarantee the security of data transmitted to our site.

Our websites may contain links to other sites. While we try to link only to sites that share our high standards and respect for privacy, we are not responsible for the content or the privacy practices employed by other sites. Please be aware that advertisers or Web sites that have links on our site may collect personally identifiable information about you. This privacy statement does not cover the information practices of those websites or advertisers.

7. HOW LONG WE HOLD YOUR INFORMATION FOR

We only keep it as long as is reasonable and necessary for the relevant activity, which may be to fulfil statutory obligations.

8. YOUR RIGHTS

You have various rights in respect of the personal information we hold about you – these are set out in more detail below. If you wish to exercise any of these rights or make a complaint, you can do so by contacting us at Town & Manor, Town Hall, High Street, Hungerford, RG17 0NF. You can also make a complaint to the data protection supervisory authority, the Information Commissioner's Office, <https://ico.org.uk/>

- **Access to your personal information:** You have the right to request access to a copy of the personal information that we hold about you, along with information on what personal information we use,

why we use it, who we share it with, how long we keep it for and whether it has been used for any automated decision making. You can make a request for access free of charge. Please make all requests for access in writing and provide us with evidence of your identity.

- **Right to object:** You can object to our processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes. Please contact us as noted above, providing details of your objection.
- **Consent:** If you have given us your consent to use personal information you can withdraw your consent at any time.
- **Rectification:** You can ask us to change or complete any inaccurate or incomplete personal information held about you.
- **Erasure:** You can ask us to delete your personal information where it is no longer necessary for us to use it, you have withdrawn consent, or where we have no lawful basis for keeping it.
- **Portability:** You can ask us to provide you or a third party with some of the personal information that we hold about you in a structured, commonly used, electronic form, so it can be easily transferred.
- **Restriction:** You can ask us to restrict the personal information we use about you where you have asked for it to be erased or where you have objected to our use of it.
- **No automated-decision making:** Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. You have the right not to be subject to automated decisions that will create legal effects or have a similar significant impact on you, unless you have given us your consent, it is necessary for a contract between you and us or is otherwise permitted by law. You also have certain rights to challenge decisions made about you. We do not currently carry out any automated decision-making.

Please note, some of these rights only apply in certain circumstances and we may not be able to fulfil every request.
