

## **Data Protection and Privacy Policy**

In carrying out its role as the group responsible for steering the process of making the St Just and Pendeen Neighbourhood Development Plan (StJPNDP) on behalf of the St Just Town Council, the StJPNDP will be holding data electronically. It may also process some of this data to provide evidence in support of the StJPNDP.

For these reasons the StJPNDP is subject to Data Protection legislation, particularly in respect of any personal data it holds.

This page describes the data that the StJPNDP will hold, what it will do with the data, who has access to the data and in what form, and what you can ask us to do with any data that relates to you.

### **Data Use**

The primary personal data that we store and use are email addresses to enable us to contact anyone who may wish to comment on the draft StJPNDP. The StJPNDP is a community plan and so community engagement is central to the task of making it. The StJPNDP will keep a list of email addresses that may also have associated names linked to them. We will not generally store postal addresses linked to names or telephone numbers, unless they have been supplied by the person concerned, due to that person not having access to on-line facilities.

### **Emails**

All emails will be handled by one nominated person within the StJPNDP who has sole access to the stjustpendeenceg@gmail.com account through which all email correspondence from the StJPNDP will take place. For reasons of due diligence, conformity, and resilience, one other person will oversee this process.

These two nominated persons will not enter into any discussion or decision making regarding public contacts, due to their knowledge of the persons identity. This ensures comments are all treated fairly and consistently.

If you contact us by email we will reply (if required) and this and any subsequent emails will remain within the email filing system however, if the content of the email requires further discussion by the StJPNDP then the content will be de-personalised before being passed on for discussion.

### **Your Comments**

All comments made to the StJPNDP will have all personal details removed before being put into any public forum or being processed by the StJPNDP team. Paper

notes on which comments are written will be kept as evidence until the StJPNHP has been made (although they would normally contain no personal data or identifiers). Comments made by email will be retained in the email filing system in their original form as evidence.

### **Other data storage**

We store documents which we have written together with other documents relevant to the task to which only two members of the StJPNDP have full access. The vast majority of these documents contain no personal data, most are available elsewhere in the public domain. Some of these will be made available to the public through the StJPNDP website at [www.stjustandpendeen-np.org.uk](http://www.stjustandpendeen-np.org.uk) as 'view only' items. None of these publicly available documents should contain any personal data or identifiers except of StJPNDP members or consultants, except where by agreement we have identified and published the name of a person interviewed in the course of our stakeholder consultations

### **End of process**

When the StJPNDP has been formed, examined and put to a referendum the StJPNDP should cease to function and all data will become the property of the St Just Town Council. If the StJPNDP has been approved by referendum then personal data will be removed at this point. If the StJPNDP has been rejected then the Town Council may seek to continue to progress a StJPNDP team in another form with a re-formed StJPNDP in which case all data will become the responsibility of this new body for the duration of its existence and it will operate under the same conditions as described here unless and until it publishes a replacement operating statement.

### **The Legal Bits**

#### **Website, Cookies, Privacy Policy and Google Analytics**

We do not use cookies on this website, however the underlying website construction (Word Press) does include a tool that allows us to see how many people visit the site, how they arrive, and what geographic region they probably visit from (eg UK, Russia, Canada, etc). This tool uses Google Analytics which requires us to put this notice on the website:

“We will not, and we will not assist or permit any third party to, pass information to Google that Google could use or recognise as personally identifiable information. We

will have and abide by an appropriate Privacy Policy (*This page*) and will comply with all applicable laws, policies, and regulations relating to the collection of information from Visitors. We must post a Privacy Policy and that Privacy Policy must provide notice of our use of cookies that are used to collect data. We must disclose the use of Google Analytics, and how it collects and processes data. This can be done by displaying a prominent link to the site “How Google uses data when you use our partners’ sites or apps”.

**This link is:** [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/)

### **Lawfulness of Processing Data**

We (the StJPNDP) process data for the purpose of exercising the public function of making a Neighbourhood Plan under the Localism Act 2011 and we believe it is necessary for the performance of this task which is being carried out in the public interest.[1]

### **Consent**

We do not need your explicit consent to process data neither do we assume you have given us consent, but we hope that you are content that we hold onto your email address if you contact us by email, or you provide us with data in any other form. However if you are not content you can email us at [stjustpendeenceg@gmail.com](mailto:stjustpendeenceg@gmail.com) to tell you what personal data we hold about you and you may at any time request us to delete this permanently from our systems.

### **References**

[1]These statements are in accordance with the advice from the Information Commissioners Office and can be found by following the links below:

<https://ico.org.uk/for-organisations/guide-to-data-protection/conditions-for-processing/>

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/lawful-bases-for-processing/>