

Privacy Notice Guidance

It has always been the case that we need to inform our customers about how and why we process their personal information and who it may be shared with. In the past we have used a standard paragraph which has been included on our application forms and on our website. However, under the new General Data Protection Regulations (GDPR), the requirement to inform people about how their information is used has been expanded. The GDPR now specifically requires us to be transparent about what we do with the personal information we collect. The regulation says that the following information should be provided to the customer at the point of collecting their personal information:

- a) The identity and the contact details of the council
- b) The contact details of the Data Protection Officer
- c) The purposes of the processing and the legal basis for processing
- d) The recipients of the personal information

In addition to this information, we should also provide the following further information necessary to ensure fair and transparent processing:

- e) The period the personal information will be stored for
- f) The right to request from the council access to and rectification or erasure of personal data
- g) If consent is used as the legal basis, the right to withdraw consent at any time
- h) The right to lodge a complaint with the ICO
- i) Consequences of failure to provide the data

What do we need to do?

The council will prepare an over-arching privacy notice which will contain much of the information set out above. However, there will be some information that services will need to provide separately.

Every service will need to prepare a privacy notice that provides more detailed information on the purpose of their processing, their legal basis for processing and any recipients of the personal information they process. These privacy notices will be available for customers to view via the council's website. A template Privacy Notice can be found at the end of this document. In addition, services should consider the following:

Application Forms – where possible, a link to the privacy notice should be included on our application forms (regardless of whether the forms are in paper or electronic form). Services are responsible for ensuring that their application forms display this notice.

If a service uses application forms that are prescribed by central government, then it should be the central government department that updates the forms to comply with the GDPR.

Telephone – we are working with Strata and aim to advise all customers contacting the council via telephone to visit the website, or call the Data Protection Officer, for details about how we process personal information.

Website – digital services (those services provided via Firmstep) which are available via the council's website will link to the privacy notice for the respective service. There will also be a page on the website called 'What we do with your information' and this will provide links to the privacy notices for every service.

Face to face – privacy notices will be on display in our Customer Service Centre and in other public facing areas. You may want to consider displaying privacy notices in your meeting rooms if you are interviewing customers and taking their personal information. A template notice for display in public areas will be made available for use by services.

Further advice

If you would like more information on how and when to use privacy notices please contact Lorraine Betts x5257 or Carrie Anne Bainbridge x5875.

Exeter City Council – (Exeter Historic Guildhall)

How we use your personal information *(this covers purpose and legal basis)*

We use your personal information so that we can process your private hire booking or ticket purchase. Should you chose to receive marketing information we may contact you with information about similar events or hire opportunities. We will only contact you if you have given us permission to do so unless we need to make you aware of important information such as the cancellation of an event you have purchased tickets for.

What we will do with it *(this covers recipients of the data)*

Your personal information will be held and used by Exeter City Council. We will use this information to contact you in order to make sure that we have full details of your requirements and to allow us to send you essential information such as invoices. We will not use your data for any purpose other than facilitating your event or managing your visit. We will not share your data with any third party, including your own customers, without your expressed permission.

If you have not given us permission to contact you we will still store your information to make booking easier and to generate a general view of booking behaviour, however, we will never share your data or send you marketing information.

In no circumstances will we ever sell your data to a third party for marketing purposes.

How long will we keep your information?

We will keep your information for up to 10 years, depending on the type of data, or until such time as you request for its removal. Where possible data is anonymised and retained for statistical purposes.

What will happen if you don't provide your personal information?

If you buy tickets or book an event with us we need you to provide your name and a means to contact you. You do not need to provide any other information but if you do not then we may be unable to keep you informed about the event you have booked for. If the event is subsequently cancelled or if the timings/content change we may not be able to let you know.

More information

To see the council's full privacy notice or to find out about your rights go to www.exeter.gov.uk/DataProtection.