



Sway Parish Council

GDPR – Data Audit

Prepared in May 2018 by the Parish Clerk

Bases for Processing Data:

- Consent: includes a positive opt-in from individuals
- Legitimate Interest: it is necessary to keep in contact to deliver service
- Legal or Statutory Obligation: the law requires the storage of data
- Performance of Contract: a contractual obligation justifies data storage
- Public Task: data is processed 'in the exercise of official authority'
- Vital Interests: in order to save a life

Description	Used for?	Basis for processing?	Who stores data and who can access?	Security controls in place?	How long is data kept for?	Covered by a privacy notice?	ACTION REQUIRED
Residents contact details	Responding to queries, resolving issues	Public Task and Legitimate Interest	Parish Clerk	Business email address and contact list held in secure and GDPR compliant cloud-based CRM (Zoho Mail)	Currently no specified expiration period	General privacy notice provided on website and linked in email footer	Consider appropriate storage duration and deletion of older data
			Councillors	Formal email addresses requested from HCC for all councillors.	Currently no specified expiration period	General privacy notice provided on website.	Each councillor needs a dedicated email address and cloud based email client
Junior Parish Council contact details	Creation and administration of the Junior Council	Parental consent and Legitimate Interest	Parish Clerk	Stored in secure and compliant cloud-based solutions (Zoho Email and Zoho Docs)	For the period of office and up to 12 months afterwards	General privacy notice provided on website and linked in email footer	Send out parental consent forms with confirmation of office



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Allotment Tenants’ contact details	Administration of allotment tenancies	Consent and Legal Obligation	Parish Clerk	Stored in secure and GDPR compliant cloud-based document storage (Zoho Docs)	Until allotment plot is revoked	Allotment Tenants’ Privacy Notice	Send to all allotment holders with SAE to return
			Allotment Committee	Periodically copied to Committee members for local storage	Unknown	Allotment Tenants’ Privacy Notice	Committee members to sign a declaration
Staff contact, contract and payroll details	Employers’ responsibilities	Legal Obligation	Parish Clerk	Stored in secure and compliant cloud-based solutions (Zoho Email and Zoho Docs)	Salary and Pay: Min. 6yrs. Income Tax and NI: Min. 3yrs	Employee Privacy Notice	Staff to sign Privacy Notice
Councillor contact details	Public Task	Statutory Obligation	Parish Clerk and Councillors	In the public domain (website)	As required	Councillor Privacy Notice	All councillors to sign Privacy Notice



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Electoral Roll	Verification of residents	Legitimate Interest	Parish Clerk (via NFDC)	Stored in secure and compliant cloud-based solutions (Zoho Email and Zoho Docs)	Delete old versions as new versions are provided	Agreement signed with NFDC	None