

HUNGERFORD TOWN COUNCIL

Privacy Notice & Data Protection Policy

Originally prepared: 13 January 2026 | Updated: 9 April 2026

1. Who We Are and How to Contact Us

This Privacy Notice is provided by Hungerford Town Council, which is the Data Controller for the personal data it collects and processes. This notice explains what personal data we collect about you, why we collect it, how we use it, and what your rights are.

This notice applies to all individuals whose data we process, including residents, visitors to our website, people who contact us, attendees at public meetings, job applicants, contractors, and councillors.

Data Controller	Hungerford Town Council
Address	The Library, Church Street, Hungerford, Berkshire, RG17 0JG
Telephone	01488 686195
General Enquiries	admin@hungerford-tc.gov.uk
Town Clerk (DPO contact)	townclerk@hungerford-tc.gov.uk
Website	www.hungerford-tc.gov.uk
ICO Registration	Z3590731

Note to Council: Please confirm the ICO Registration Number and insert it above. Parish and town councils with an annual turnover exceeding £632 must register with the ICO. You can verify your registration at www.ico.org.uk/about-the-ico/what-we-do/register-of-fee-payers/

2. The Law Governing Our Use of Your Data

The processing of personal data by Hungerford Town Council is governed by:

- The UK General Data Protection Regulation (UK GDPR)
- The Data Protection Act 2018
- The Human Rights Act 1998
- Any other applicable legislation relating to personal data and privacy

Under UK GDPR Article 6, we must have a lawful basis for processing your personal data. The lawful bases we rely on are:

Consent (Art. 6(1)(a))	Where you have given clear, specific consent for us to process your data for a particular purpose. You may withdraw consent at any time.
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Contract (Art. 6(1)(b))	Where processing is necessary for a contract with you, or to take steps at your request before entering a contract (e.g. employment contracts, tenancy agreements).
Legal Obligation (Art. 6(1)(c))	Where processing is necessary to comply with a legal obligation, such as payroll, audit requirements, or freedom of information requests.
Public Task (Art. 6(1)(e))	Where processing is necessary for us to perform tasks in the public interest or in the exercise of official authority, such as managing public spaces, holding meetings, and providing community services.

3. What Personal Data We Collect and Why

3.1 When You Contact Us

When you contact us by phone, email, letter, or through our online forms, we collect:

- Name and title
- Address (postal and/or email)
- Telephone number
- The nature and content of your enquiry
- Any other information you choose to provide

We use this information to respond to your enquiry, provide information about our services, and maintain a record of our communications with you. Your personal information will not be shared with third parties without your consent, except where required by law.

3.2 When You Attend a Public Meeting

When you attend or participate in a public council meeting, we may collect:

- Your name (if you speak or submit questions in advance)
- Questions or representations you submit in writing or verbally

Meetings are held in public and, in some cases, minutes or recordings may be published. Public contributions made at meetings may be included in publicly available minutes. We will not publish personal contact details (such as addresses or email addresses) in meeting minutes.

3.3 When You Use Our Website

When you visit our website, we may collect limited technical information, including:

- Browser type and version
- Pages visited and time spent on the site
- Referring URLs
- General location data (country/region level)

This data is collected through cookies and analytics tools. Please refer to our Cookie Policy for full details. We use this information only to understand how our website is being used and to improve the experience for all users. We do not use this data to identify individuals.

3.4 CCTV

Hungerford Town Council operates Closed-Circuit Television (CCTV) cameras at a number of locations it manages within the town. CCTV is used to:

- Help keep staff, service users, visitors and the public safe
- Deter and reduce the risk of crime and anti-social behaviour
- Assist in the investigation and prosecution of offences when they occur

CCTV data is processed under the lawful basis of public task (UK GDPR Art. 6(1)(e)) and, where applicable, legitimate interests. All CCTV recordings are retained for a minimum of 31 days. Where no legitimate request for retention has been received, recordings are then erased or overwritten. Full details of how CCTV footage is managed, retained, accessed and disclosed are set out in our CCTV Policy, available at www.hungerford-tc.gov.uk/cctv

3.5 Councillors and Officers

We process personal data relating to elected councillors and employed or contracted officers to enable us to carry out our functions as a local authority. This includes:

- Contact details (name, address, email, telephone)
- Declaration of interests and register of gifts
- Photographs and biographies published on the website (with consent)
- Attendance records at meetings
- Payroll and HR data (for employed staff)

Councillors' names, ward information and declaration of interests are published as required by law. Councillors may also request removal of their home address from public documents; please speak to the Town Clerk.

3.6 Job Applicants

When you apply for a role with the council, we collect information including your CV, covering letter, qualifications, employment history, and references. This information is used solely for the purposes of assessing your application. If unsuccessful, application data is retained for six months and then securely deleted.

3.7 Grant Applicants and Contractors

When you apply for a council grant or enter into a contract with us, we collect the contact and organisational details necessary to administer that agreement. This information is retained in accordance with our Retention Schedule (see Section 7).

4. Children's Data

We will not knowingly collect or process personal data relating to a child under the age of 13 without the express written consent of a parent or guardian. Where we run activities or consult with young people (for example, regarding play parks or community facilities), we will obtain appropriate parental consent and process children's data with additional care.

Where consent is sought from or on behalf of a child, we will ensure the language used is clear and appropriate to the child's age and understanding.

5. Who We Share Your Data With

Hungerford Town Council does not sell, rent or trade personal data. We will not share your data with third parties for marketing or commercial purposes.

We may share data in the following limited circumstances:

- With West Berkshire Council or other public bodies where required by law or necessary to carry out our public functions
- With our contracted service providers who process data on our behalf (e.g. payroll providers, IT systems, website hosting). These processors are bound by contractual obligations to handle data securely and only as instructed by us
- With Thames Valley Police or other law enforcement agencies where disclosure is required or permitted by law (e.g. in response to CCTV access requests)
- With our insurers or legal advisers where necessary to defend or pursue legal claims
- With the Information Commissioner's Office (ICO) if required

Where we use third-party data processors, we ensure that written data processing agreements are in place, in accordance with UK GDPR Article 28.

6. Automated Decision-Making and Profiling

Hungerford Town Council does not use any form of automated decision-making or profiling of individuals. All decisions affecting residents or service users are made by council officers or councillors.

7. How Long We Keep Your Data

We will only keep your personal data for as long as it is necessary for the purpose for which it was collected, or as required by law. The following provides a general guide to our retention periods:

Type of Data	Retention Period	Lawful Basis
General correspondence and enquiries	2 years	Public task / Consent
Council meeting minutes and agendas	Permanent (public record)	Legal obligation
Financial records and contracts	7 years	Legal obligation
CCTV footage (no incident)	31 days minimum, then deleted	Public task
CCTV footage (retained for investigation)	As required by the investigation	Public task / Legal obligation

Job application records (unsuccessful)	6 months	Legitimate interests
Employment records (staff)	6 years after employment ends	Legal obligation
Grant application records	7 years	Legal obligation / Public task
Website analytics data	26 months	Consent / Legitimate interests

Our full Retention Schedule is available on request from the Town Clerk. At the end of the applicable retention period, personal data is securely deleted or anonymised.

8. How We Keep Your Data Secure

Hungerford Town Council takes its responsibility for information security seriously. We have implemented appropriate technical and organisational measures to protect personal data against:

- Unauthorised access or disclosure
- Loss, alteration or destruction
- Unlawful processing

Our security measures include:

- Password-protected systems with access controls to limit who can view personal data
- Secure email and encrypted file storage where appropriate
- Physical security of our office premises
- Regular review of our data protection policies and procedures
- Staff awareness of their data protection responsibilities

In the event of a personal data breach that is likely to result in a risk to individuals' rights and freedoms, we will report the breach to the ICO within 72 hours and, where required, notify affected individuals without undue delay.

9. Your Rights Under UK GDPR

Under UK GDPR and the Data Protection Act 2018, you have a number of rights in relation to the personal data we hold about you. These are summarised below:

Right of Access	You have the right to request a copy of the personal data we hold about you (a 'Subject Access Request'). We will respond within one calendar month.
Right to Rectification	You have the right to ask us to correct personal data that is inaccurate or incomplete.
Right to Erasure	You have the right to ask us to delete your personal data in certain circumstances, for example when it is no longer needed for the purpose it was collected.

Right to Restrict Processing	You have the right to ask us to restrict how we process your data in certain circumstances, for example while we are investigating an accuracy dispute.
Right to Data Portability	Where we are processing your data by automated means and on the basis of consent or contract, you have the right to receive your data in a portable, machine-readable format.
Right to Object	You have the right to object to processing carried out on the basis of public task or legitimate interests. We will stop processing unless we have compelling legitimate grounds.
Rights re. Automated Decisions	You have the right not to be subject to a decision made solely by automated processing. As noted in Section 6, we do not use automated decision-making.
Right to Withdraw Consent	Where processing is based on your consent, you may withdraw that consent at any time. Withdrawal does not affect the lawfulness of processing before the withdrawal.

To exercise any of these rights, please contact the Town Clerk:

- Email: townclerk@hungerford-tc.gov.uk
- Post: The Town Clerk, Hungerford Town Council, The Library, Church Street, Hungerford, RG17 0JG
- Telephone: 01488 686195

We will acknowledge your request within five working days and aim to respond fully within one calendar month. In complex cases or where a large volume of data is involved, we may extend this period by a further two months, in which case we will notify you of the extension.

We will not charge a fee for handling most requests. However, where requests are manifestly unfounded or excessive (particularly where repetitive), we may charge a reasonable fee or decline the request.

10. Cookies

Our website uses cookies – small text files placed on your device – to help us provide a good browsing experience. Cookies we use include:

- Essential cookies: required for the website to function correctly (e.g. session management, accessibility tool preferences). These do not require your consent.
- Analytics cookies: used to understand how visitors use our website (e.g. pages visited, time on site). These are only placed with your consent.

When you first visit our website, you will be shown a cookie notice and given the option to accept or decline non-essential cookies. You can change your cookie preferences at any time using the cookie settings link in the website footer.

You can also control cookies through your browser settings. Please note that blocking essential cookies may affect the functionality of the website.

Note to Council: A full Cookie Policy should be published as a separate, linked document on the website. This notice provides a summary; the separate policy should list each specific cookie, its purpose, provider, and duration.

11. International Transfers of Data

We do not routinely transfer personal data outside of the United Kingdom. If we are required to do so (for example, through the use of a third-party software provider whose servers are located outside the UK), we will ensure that appropriate safeguards are in place in compliance with UK GDPR requirements, and we will inform you of such transfers in the relevant privacy notice or consent form.

12. How to Make a Complaint

If you have a concern about the way Hungerford Town Council has handled your personal data, we encourage you to contact us in the first instance so that we can try to resolve the matter:

- Email: townclerk@hungerford-tc.gov.uk
- Telephone: 01488 686195
- Post: The Town Clerk, Hungerford Town Council, The Library, Church Street, Hungerford, RG17 0JG

We will acknowledge all complaints within five working days and aim to provide a full response within 20 working days.

If you remain unhappy with our response, or if you wish to raise a concern directly, you have the right to complain to the Information Commissioner's Office (ICO):

ICO Website	www.ico.org.uk/make-a-complaint
ICO Helpline	0303 123 1113
ICO Textphone	01625 545860
ICO Post	Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
ICO Email	casework@ico.org.uk

13. Data Protection and Council Governance

From the 2025/26 financial year, the Annual Governance and Accountability Return (AGAR) includes Assertion 10, which requires smaller authorities to confirm they have appropriate data protection measures in place. Hungerford Town Council is committed to meeting this requirement by:

- Maintaining this Privacy Notice and reviewing it at least annually
- Keeping a Record of Processing Activities (RoPA) documenting the personal data we hold, its purpose, lawful basis, and retention period
- Conducting Data Protection Impact Assessments (DPIAs) when introducing new systems or significantly changing the way we process personal data
- Ensuring all staff and councillors understand their data protection responsibilities
- Registering with the ICO as a data controller and keeping that registration up to date

This approach is aligned with the NALC Data Protection Roadmap (published November 2025), which provides parish and town councils with a structured guide to embedding strong data protection practices into everyday council operations.

14. Review of This Privacy Notice

This Privacy Notice will be reviewed at least annually and updated whenever there are significant changes to the way we process personal data, or when required to do so by changes in legislation or guidance.

Originally prepared	13 January 2026
Updated	9 April 2026
Next scheduled review	April 2027
Legislation	UK GDPR & Data Protection Act 2018

The current version of this Privacy Notice is always available on our website at www.hungerford-tc.gov.uk and in hard copy from the Town Council office on request.