

Privacy Notice for Communications

Introduction

This notice is provided within the context of the changes required by the EU General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA).

This document will therefore be subject to ongoing review to ensure it continues to align with the requirements of all applicable legislation.

Service description

It is necessary for Thanet District Council to collect and process some personal information as part of its communications activities.

Processing activity

It is necessary for the Council to collect and hold some personal information about you. The information collected and held will vary and depend on the nature of the service. We will process personal information relating to:

1. Council e-newsletter subscriptions
2. Council focus group subscriptions
3. Press release - subscriptions
4. Press release - publication
5. Press and media monitoring
6. Corporate consultations

1. Council e-newsletter subscriptions

Personal information we collect about you

- Name
- Email address
- Optional - postcode

Where we get your information from

This information is collated via an e-form which you will be required to complete once you have asked to subscribe to the e-newsletter.

The lawful basis for processing your information

The Council's lawful basis for processing your personal information is¹:

¹ Under Article 6 of GDPR

- Based on obtaining your consent to use your data in issuing the council's e-newsletter.

How we will use the information about you?

Your email address will only be used by Thanet District Council to keep you informed and up to date with council news and information as part of the e-newsletter to which you subscribe. While your email address remains within the database you will receive regular newsletter-style emails.

Who will we share that data with?

We use a service called MailChimp which provides us with email marketing services.

If you choose to add your name to any of our email newsletters your email address will be forwarded to MailChimp, which is a third party data processor. Your email address will be stored on MailChimp's servers located in the United States of America. Mailchimp is authorised to hold personal data from the United Kingdom as it is certified to the EU-US Privacy Shield regime.

You can view MailChimp's privacy policy [here](#).

Data Retention

Your name, email address and postcode will remain within MailChimp's database for as long as we continue to use MailChimp's services or until you specifically ask to be removed from the list.

You can remove yourself from the list by the unsubscribe link at the bottom of any email newsletter, or you can email communications@thanet.gov.uk to ask to be removed from the list. Please send your removal request using the email account that is subscribed to the mailing list.

2. Council focus group subscriptions

Personal information we collect about you

- Your name
- Your email address

Where we get your information from

This information is collated from you via an e-form once you have asked to subscribe to attend council focus groups.

The lawful basis for processing your information

The Council's **lawful basis** for processing your personal information is²:

- The Council has focus groups as this is a task in the public interest;
- Based on obtaining your consent to use your data in issuing the council's focus group e-newsletter.

² Under Article 6 of GDPR

How we will use the information about you?

Your email address will only be used by Thanet District Council to keep you informed and up to date with council focus group meetings to which you subscribe. While your email address remains within the database you will receive regular newsletter-style emails with details of future focus group meetings and feedback and actions from the meetings you have attended.

Who will we share that data with?

Data is processed by MailChimp, which is a third party data processor. Your email address is stored on MailChimp's servers located in the United States of America. Mailchimp is authorised to hold personal data from the United Kingdom as it is certified to the EU-US Privacy Shield regime. You can view MailChimp's privacy policy [here](#)

Data Retention

Your email address will remain within MailChimp's database for as long as we continue to use MailChimp's services or until you specifically ask to be removed from the list.

While your email address remains within the MailChimp database, you will receive regular information about resident focus groups from us.

You can change your mind at any time by clicking the unsubscribe link in the footer of the updates you receive from us or by contacting press.office@thanet.gov.uk. Please send your request using the email account subscribed to the mailing list.

3. Press release - subscription

What and how we get your personal information we collect about you

Reporters or representatives from the press/media can ask to subscribe to receive press releases issued by the council by giving us their email details. The data collected for this purpose is an email address which will be added to the Press Release distribution list on Vuelio, our Media Management system.

The lawful basis for processing your information

The Council's **lawful basis** for processing your personal information is³:

- For the performance of a task carried out in the public interest; and/or
- Based on giving your consent to receive Council issued press releases

How we will use the information about you?

Once you choose to subscribe your email address will be added to our press release distribution list and will be used to send you electronic press releases issued by the council.

³ Under Article 6 of GDPR

There are two ways a journalist's details could be stored on Vuelio.

1. Direct through Vuelio

The Vuelio database is an opt-in database so Vuelio asks permission to include journalists on the site. Journalists can request to be removed from this database at any time. The journalist can contact Vuelio with their request and they will remove them promptly.

2. Through TDC

TDC can manually add its own contacts to Vuelio. All journalist details stored by TDC can only be seen and managed by TDC. Any changes we make to our private contacts won't affect the Vuelio database.

Who will we share that data with?

If you choose to subscribe to receive press releases, your email address will be added to Vuelio, our Media Management system. This is managed by a third party data processor, Access Intelligence which is a UK software provider whose websites and software are all hosted in the UK, therefore your data will not be processed outside the United Kingdom.

Data Retention

Your email address will remain within Vuelio's database for as long as we continue to use Vuelio's services or until you specifically ask to be removed from the list. While your email address remains within Vuelio's database, you will receive council issued press releases from us. You can view Vuelio's privacy policy [here](#).

You can change your mind at any time by clicking the unsubscribe link in the footer of the press releases you receive from us or by contacting press.office@thanet.gov.uk. Please send your request using the email account subscribed to the mailing list.

4. Press release - publication

Personal information we collect about you

We may occasionally include personal information in publicly issued council press releases if you have been prosecuted by the court following enforcement action taken by the council.

Your name and address would be included within the press release in order to identify you and ensure anyone with the same name is not mistaken.

The lawful basis for processing your information

The Council's lawful basis for processing your personal information is:

- For the performance of a task carried out in the public interest.

Additional lawful basis for processing other categories of data

Some of the information that is collected is classified as personal data consisting of **criminal convictions and offences** (including alleged offences).

In order for the Council to collect and process **criminal convictions information**, we are required to have a lawful basis under Article 6 of GDPR and under Article 10 of the GDPR which includes basing the processing on the provisions of the Data Protection Act 2018 (DPA). In this case in addition to the lawful basis under article 6 (above); the Council is performing the task of reporting in the public interest, and has documented below how long it will be storing this information.

How we will use the information about you?

This information will be used to identify you within a council press release should you be prosecuted by the court following enforcement action taken by the council. This is to demonstrate that such illegal or inappropriate behaviour will not be tolerated.

Prosecutions can be publicly viewed so information disclosed within our press releases is already available within the public arena and is only ever released after the prosecution.

Who will we share that data with?

All press releases are shared with press/media representatives who have subscribed to receive our press releases via our Media Management system, Vuelio. If you choose to subscribe to receive press releases, your email address will be added to Vuelio, our Media Management system. This is managed by a third party data processor, Access Intelligence which is a UK software provider whose websites and software are all hosted in the UK, therefore your data will not be processed outside the United Kingdom.

Press releases issued are also published on the council's website.

Data Retention

Press releases remain on the council's website for a period of one year after which point they are archived.

Press releases are stored on the council's Media Management system, Vuelio, so once archived can only be shared upon request by contacting press.office@thanet.gov.uk. Archived press releases will remain within Vuelio's database for as long as we continue to use Vuelio's services.

5. Press and media monitoring

Personal information we collect about you

If someone from the press/media logs a press enquiry with the council their details are added to Vuelio, our Media Management system. This includes name, media organisation, email address and telephone number.

The lawful basis for processing your information

The Council's **lawful basis** for processing your personal information is⁴:

- "Because it is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract". Notably, normal rules of contract law applies, relevantly, the contract can be unwritten and/or implied and there is something expected in return;
- Also, because as an accountable public authority, it is in the legitimate interests of the Council to collect and store details of parties they are sending information to.

How we will use the information about you?

We use this data in order to be able to respond to your press enquiry and to monitor any subsequent media coverage.

There are two ways a journalist's details could be stored on Vuelio.

1. Direct through Vuelio

The Vuelio database is an opt-in database so Vuelio asks permission to include journalists on the site. Journalists can request to be removed from this database at any time. The journalist can contact Vuelio with their request and they will remove them promptly.

2. Through TDC

TDC can manually add its own contacts to Vuelio. All journalist details stored by TDC can only be seen and managed by TDC. Any changes we make to our private contacts won't affect the Vuelio database.

Who will we share that data with?

Our Media Management system Vuelio is managed by a third party data processor, Access Intelligence which is a UK software provider whose websites and software are all hosted in the UK, therefore your data will not be processed outside the United Kingdom.

Data Retention

Your e-mail address will remain within Vuelio's database for as long as we continue to use Vuelio's services or until you specifically ask to be removed from the list. You can view Vuelio's privacy policy [here](#).

You can change your mind at any time by contacting press.office@thanet.gov.uk. Please send your request using the email account registered with Vuelio.

6. Corporate consultations

Personal information we collect about you

⁴ Under Article 6 of GDPR

Many of the public consultation exercises we conduct no longer require the collection of personal data. If there is a need to verify respondents we may sometimes ask for a name, address (or sometimes just postcode) and possibly a contact email.

On more rare occasions we may also ask for certain personal characteristics such as sex, age, ethnicity and disability. This would only ever be collated if we need to ensure that the subject matter of the consultation does not discriminate against these particular characteristics

The lawful basis for processing your information

Under GDPR, the Council is permitted to use your information this way because this is a task carried out in the public interest⁵.

How we will use the information about you?

If a consultation is only open to Thanet residents, information can be used to verify that the consultation response has been submitted by someone living within the district. Some consultations are open to all members of the public regardless of whether they live inside or outside of the district and on these occasions an address may not be required.

Information we gather may be used to provide you with updates on the outcome of the consultation - we would identify this to you in advance if so.

Where we ask for particular characteristics (such as age, gender, ethnicity, disability) this is used purely for analysis to ensure that the outcome of the consultation does not discriminate against a particular characteristic.

The information is stored on our internal databases and purely used to aid the analysis of the consultation response. Personal data would never be disclosed and consultation responses will never be attributed to an individual.

Who will we share that data with?

Information is stored on internal databases only. It would not be published nor passed on to any third parties and will only be used internally for the purposes of analysing the response to the consultation.

Data Retention

Personal information processed is destroyed after five years from closure for any significant policies or after one year from closure from minor policies in accordance with the Communications retention schedule.

Your rights

You have the right to request information that is held about you and this is known as the 'right of subject access'. Making a request for your personal information is known as a 'Subject Access Request'. You are entitled to receive a copy of your records free of charge and within a month. For

⁵ Under Article 6 of the GDPR

more information on how we process your personal information and how to make a subject access request, please visit <https://www.thanet.gov.uk/privacy-statement/>

Please note that in certain circumstances access to your records may be limited, for example, if the records you have asked for contain information relating to another person.

You also have the right to rectify errors in your records, the right to withdraw consent given to process your data, and the right to have your data erased when you have withdrawn consent. You also have the right to data portability in some cases. If you wish to exercise any of these rights, you should contact the Data Protection officer using the contact details provided below.

You have the right to be told if we have made a mistake whilst processing your data and we will self-report breaches to the Information Commissioner.

This is also available in other formats (e.g. print).

Further information

If you would like to know more about how we use your information or to exercise any of your rights, please contact:

The Data Protection Officer
Thanet District Council
Cecil Street
Margate
CT9 1XZ
Email: dataprotection@thanet.gov.uk
Tel: 01843 577000

How do I Complain?

You also have the right to complain to the Information Commissioner's Office, at:

The Information Commissioner
Wycliffe House, Water Lane, Wilmslow, Cheshire
SK9 5AF
Phone: 0303 123 1113 or 01625 545745
Website: www.ico.org.uk