

## **Privacy Policy – Commercial Assets and Property Development**

This privacy notice explains how Dacorum Borough Council (the ‘Controller’) will use any personal information we collect about you when you use our services.

It has been written to give you a clear explanation of our data processing practices to safeguard you and your personal information

### **What information do we collect about you?**

What information do we collect about you?

- Name, Address and contact details
- Company Details (Registered Address and Premises Address)
- Bank Details, references, credit checks.
- Car registration numbers

### **How will we use the information about you?**

The information that the Council will collect varies depending on how you use the Council’s Services. We are using the information provided in this case because we have a Legal obligation {GDPR Article 6(1) (c)} “performance of a legal obligation to which the controller is subject, under the Housing Act 1985 (RTB) and Article 6(1) (b) - processing 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. The Council also has an obligation under GDPR Article 6 (1) (a) “Data subject has given consent to processing”.

The Council is collecting personal information under the lawful bases for the following purposes;

- Granting of and management of commercial tenancies
- Commercial Property Mailing List
- Lease Renewals
- Manage the ‘Right to Buy’ application
- Land and Building Sales
- Management of the Woodwells Caravan Park site, waiting list and applications
- Management of Allotments and the waiting list
- Financial Transactions
- Roundabout Sponsorship
- Sports Pitch and Pavilion Hire

### **Special Categories of Data**

If you’re providing us with special category personal information (such as details about your health) we will be processing this under Article. 9(2) and Article 10.

- Disability Information

Processing of Special Category Data is carried out specifically under the following;

Article 9(2) (a) – the data subject has given explicit consent to the processing of those personal data for one or more specified purposes, except where Union or Member State law provide that the prohibition referred to in paragraph 1 may not be lifted by the data subject;

### **Sharing / Recipients**

We may share the information with other recipients for the purposes of carrying out the functions (listed above) with;

- Service Providers

- Internal Council Departments (e.g. Legal, Housing (for RTB) Finance & Accounts for billing purposes, Revenues and Benefits, Anti-Fraud for the purposes of prevention and detection of fraud)
- Police for purposes of prevention and detection of crime, missing persons enquiry or proof of life enquiry

### **How long will we keep this information?**

We will destroy this personal information in accordance with our [Retention Policy](#). To determine how long we should keep information, we consider what the legislation states and what is good practice. This means we will securely destroy the information once we no longer need it. If you would like to know the specific period of time that relates to your personal information please contact [foi@dacorum.gov.uk](mailto:foi@dacorum.gov.uk)

### **Security and Location of Data**

We will ensure that all personal information is kept securely on servers hosted in the U.K.

Access to all our user information is restricted. Only employees who need the information to perform a specific job are granted access to personally identifiable information.

The servers on which we store personally identifiable information are kept in a secure environment which is continually monitored and tested.

### **Accuracy of Personal Data (Article 5(1) (d))**

“Personal data must be accurate and, where necessary kept up to date; every reasonable step must be taken to ensure that Personal Data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.”

You have a right to request information about you be corrected. Please contact the team on [es-estates@dacorum.gov.uk](mailto:es-estates@dacorum.gov.uk), who will validate the information and update the information in our systems accordingly.

### **Individuals' Rights**

You have a right to request a copy of the personal information that we hold about you. If you would like a copy of some or all of your information, please contact [foi@dacorum.gov.uk](mailto:foi@dacorum.gov.uk) in the first instance or visit <http://www.dacorum.gov.uk/home/open-data/personal-information>

You may have a right to request erasure of Special Category information (where the lawful basis is consent (information has been freely provided by you in support of an application), and the council do not have a legal obligation to process this information. The Council will consult with the relevant agency; i.e. Police, Health Organisations, Trusts, County Council, Safeguarding Teams, to validate your request prior to consideration of the request to remove.

You have a right to request erasure, rectification or restriction where you have provided the Council information under on the lawful basis of consent (Article 6(1) (a)). Please contact [foi@dacorum.gov.uk](mailto:foi@dacorum.gov.uk) in the first instance.

### **Consent**

You may withdraw your consent to the Council processing your information at any time by contacting the Council's Legal Dept. at [foi@dacorum.gov.uk](mailto:foi@dacorum.gov.uk)

Note: Consent cannot be withdrawn if the council have a Legal or Contractual obligation to process your data.

### **Notification of changes**

From time to time it will be necessary to update this Privacy Policy. This is in order to ensure our users are always aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it.

If at any point we decide to use personally identifiable information in a manner different from that stated at the time it was collected, we will notify users. Users will have a choice as to whether or not we use their information in this different manner. We will use information in accordance with the privacy policy in force at the time the information was collected.

### **Cookies**

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to make your use of the internet better. For further information on how we use these and how you can control it, please visit <http://www.dacorum.gov.uk/home/cookies-policy>

### **Our Data Protection Policy**

We have a General Data Protection Regulation (GDPR) Policy in place and this can be found [here](#):

### **Data Protection Officer**

Our Data Protection Officer for the purposes of Articles 37 to 39 of the General Data Protection Regulation is the Information Security Team Leader (Legal Governance). You can contact them by emailing [foi@dacorum.gov.uk](mailto:foi@dacorum.gov.uk) or calling 01442 228538.