

Office of Jo Churchill MP

Data Protection Policy

This document outlines how the Office of Jo Churchill MP processes and manages personal data. It:

- 1) identifies our data controller;
- 2) provides our legitimate interest for processing personal data;
- 3) outlines the scope of personal data we hold and process;
- 4) outlines the scope of the special category personal data we hold and process;
- 5) describes and justifies our data retention policy;
- 6) shows how we intend to respond to Subject Access Requests; and
- 7) contains a copy of our privacy notice.

The policies outlined within this document come into full effect on Friday 25th May 2018.

1. Data Controller

The Data Controller is Jo Churchill MP.

Contact Details:

Jo Churchill MP, House of Commons, Westminster, London SW1A 0AA
Or 10 Hatter Street, Bury St Edmunds IP33 1LZ
Jo.Churchill.MP@parliament.uk

2. Legitimate interest for processing

- i. Casework is processed primarily under the legitimate interest of **public task**, with exceptional cases processed under the legitimate interest of **consent**.
- ii. Personal data contained in the non-political Jo Churchill MP Mailing List is processed under the legitimate interest of **public task**. It does not fall within the definition of direct marketing.
- iii. We undertake to always act within the reasonable expectations of our constituents and any other individuals about whom we hold personal data.

3. Data we hold

As of 25th May 2018, the office holds information on X number of constituents.

We operate a paperless office. Personal data is stored electronically and securely on our computer systems. Our systems are in offices which are locked when unattended.

Casework

The Office uses a CMS (Content Management System) application, Cross Reference, to help with the management of constituent casework records. This information predominantly includes but is not limited to:

- National Insurance Numbers, Passport Numbers
- Special Category data, outlined in point 4

Policy

Casework is stored in a folder system on Microsoft Outlook.

This information predominantly includes but is not limited to:

- Names, addresses and email addresses
- Telephone numbers
- Special category data

Mailing lists

The Office also maintains a mailing list of subscribers to the Jo Churchill MP Mailing List. These subscribers receive Jo Churchill's periodical newsletter and information. Personal data we hold in this regard includes:

- Names, addresses and email addresses

This information is not political in nature and therefore it is not categorised as direct marketing.

4. Special category data we hold

The office may also hold special category data for a smaller number of data subjects. This data will be processed under the legitimate interest indicated in point two, as is permitted in clauses 23 and 24 of schedule 1 of the Data Protection Act. The data may include:

- Political opinions
- Religious beliefs
- Trade union activities
- Sexual orientation
- Race and ethnic origin
- Details of criminal offences
- Physical and mental health

Content and Withdrawal forms: <https://tinyurl.com/y7q55pxv>

5. Data retention policy

Our office will hold personal data for no longer than one five-year parliamentary term. From 25th May 2018, we will only hold data dating from **Monday 11th May 2015** inclusive. Casework

and policy queries are often revisited to provide the best service and representation for constituents, from whom we may continue to receive correspondence. Therefore, we feel it is reasonable for an elected representative to hold personal data for the duration of a parliamentary term.

Following an election, we will retain personal data for three months, during which time constituents can contact us to ask that we retain their data.

6. Subject Access Requests

We will comply to Subject Access Requests in line with the guidance given by the Information Commissioners Office (ICO).

- i. We will respond as quickly as possible, within 30 calendar days.
- ii. We will request verification of the identity of any individual making a request, and ask for further clarification and details if needed.
- iii. Data subjects have the right to the following:
 - a. To be told whether any personal data is being processed
 - b. To be given a description of the personal data, the reasons it is being processed and whether it will be given to another organisations or people.
 - c. To be given a copy of the information comprising the data, and given details of the source of the data where this is available.

7. Privacy notice

Our office will undertake to ensure all constituents sharing their personal data can have the opportunity to read our privacy notice. We will:

- i. Publish our privacy notice on Jo Churchill's website, www.jochurchill.org.uk
- ii. Add a link to our privacy notice to staff email signatures, and to Jo's email signature.
- iii. Add a link to our privacy notice on Jo's auto-response on Microsoft Outlook.
- iv. Direct constituents who contact us via letter and telephone to our privacy notice online, or supply them with a paper copy if needed.
- v. Modify our voicemail messages to include information about how constituents can read our privacy notice.

Privacy Notice

In line with data protection standards, the office of Jo Churchill Member of Parliament for the Bury St Edmunds constituency and Data Controller, processes constituents' data for casework and related purposes under legitimate interest of public task. In instances where this legitimate interest is not sufficient and explicit consent is required, a member of this office will contact the data subject to establish consent. Data will be processed only to the extent to which it is necessary to achieve the stated purposes of assisting with casework and policy queries.

Data subjects have the right to request access to all their personal data that is held by the office of Jo Churchill MP by making a subject access request to this office by email to

jo.churchill.mp@parliament.uk or in writing to Jo Churchill MP at the House of Commons, Westminster, London SW1A 0AA or Jo Churchill MP at 10 Hatter Street, Bury St Edmunds IP33 1LZ.

If the data this office holds on a data subject is no longer necessary for the casework and related processes for which it was collected, the data subject has the right to request erasure of that data. The data subject also has the right of rectification if the data that this office holds on them is no longer correct. This office will not use the data subjects personal data in a way that goes beyond reasonable expectations.

Who is the Data Controller?

The Data Controller is of Jo Churchill, Member of Parliament for the Bury St Edmunds constituency.

What does the Office do?

The office discharges the duties and functions of an elected Member of Parliament. As part of this work, we conduct constituency casework and respond to policy queries, for which we must process personal data of our constituents. We also manage a small, non-political mailing list for the purpose of sending Jo Churchill's E-Newsletter and information.

How do we process data?

This office processes constituents' data under the legitimate interest of public task. In instances where this legitimate interest is not sufficient and explicit consent is required, a member of the office will contact you to establish your consent.

We are committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy.

Will we share your data with anyone else?

If you have contacted Jo Churchill about a personal or policy issue, we may pass your personal data on to a third-party in the course of dealing with you, such as local authorities, government agencies, public bodies, health trusts, regulators, and so on. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only for the basis upon which they were originally intended. When they no longer need your data to fulfil this service, they will dispose of the details in line with our procedures.

We will not share the personal information of members of the Jo Churchill MP Mailing List or those in receipt of our E-Newsletter.

In any case, we will not use your personal data in a way that goes beyond your reasonable expectations in contacting us.

For how long will you keep my personal data?

Unless specifically requested by you, our office will hold your personal data for no longer than one parliamentary term, or five years, whichever is shorter.

Casework and policy queries are often revisited to provide the best service and representation for constituents, from whom we may continue to receive correspondence. Therefore, we feel it is reasonable for an elected representative to hold personal data for the duration of a parliamentary term.

Following an election, we will retain personal data for a further three months, during which time constituents can contact us to ask that we retain their data.

What rights do I have to my personal data?

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing, such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: if our office refuses your request under rights of access, we will provide you with a reason why. You have the right to complain.

How can I contact somebody about my privacy?

You can get in touch with our office by letter, email or telephone using the details at the foot of this page.

Please note that we will ask for identification should you choose to exercise any of the above rights in relation to personal data we hold.