

# Data Protection and Privacy Policy

This document outlines how this web site processes and manages personal data and:

- Identifies the data controller.
- Explains the lawful basis for processing personal data.
- Outlines the personal data held and processed.
- Outlines the scope of the special category personal data held and processed.
- Outlines the process of Subject Access Requests.

## 1. Data Controller

The Data Controller is The Rt Hon Anne Milton MP

## 2. Contact

If you have any questions about this policy or for more information about how we use your data or would like to exercise any of your rights contact:

The Rt Hon Anne Milton MP  
House of Commons,  
London,  
SW1A 0AA

Tel: 020 7219 8392

Email: [anne.milton.mp@parliament.uk](mailto:anne.milton.mp@parliament.uk)

## 3. Lawful basis for processing

All processing is carried out by consent or either under the legitimate interest of the Rt Hon Anne Milton MP, or public interest. These cover processing to conduct casework, campaigning and communication. Where processed under the lawful basis of a task carried out in the public interest, it is to support or promote democratic engagement. This includes fundraising activity in order to support democratic engagement.

## 4. Data sources

Data held is that provided by you when you contact us and correspondence with third parties in response to cases taken up on your behalf. If you do not wish for us to contact you by telephone please do not provide this information. The Register of Electors that councils provide to authorised persons under the Representation of the People Act is also used for electoral purposes.

## 5. Data Security

Personal data is stored electronically and securely. We ensure that our service providers comply with the same high standards

## **6. Special category data**

Special category data will be processed under the lawful basis indicated in section 3, as is permitted in clauses 22, 23 and 24 of schedule 1 of the Data Protection Act, covering political parties and elected representatives.

## **7. Transferring your data outside of the European Economic Area**

Some service providers are located outside of the European Economic Area (EEA) and therefore it may be necessary to transfer your personal data outside of the EEA. Where the transfer of your data outside of the EEA takes place we will make sure that it is protected in the same way as if the data was inside the EEA, and it only occurs with your consent.

We will use one of the following safeguards to ensure this:

- Where the European Commission has issued an adequacy decision determining that a non-EEA country or organisation ensures an adequate level of data protection.
- A contract is put in place with the recipient of the data obliging them to protect the data to the same standards as the EEA.
- The transfer is to an organisation that complies with the EU-US Privacy Shield.

Legally it is not permitted to transfer certain types of data, such as Electoral Register Data, outside of the EEA, and we honour that obligation.

## **8. Data retention policy**

Personal data will be held for no longer than necessary.

## **9. Subject Access Requests**

Subject Access Requests are dealt with in line with the guidance given by the Information Commissioner's Office (ICO):

- We will request verification of the identity of any individual making a request, and ask for further clarification and details if needed.
- We will respond within 28 calendar days once we have confirmed it is a legitimate request.
- Data subjects have the right to the following:
  - o To be told whether any personal data is being processed
  - o 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.
  - o To be given a copy of the information comprising the data, and given details of the source of the data where this is available.

## **10. Will we share your data with anyone else?**

If you have contacted us about a personal or policy issue, your data may be passed on to a third-party in the course of dealing with your enquiry, 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.

We may need to share your data with a third party, such as the police, if required to do so by law.

Data may also be shared with entities of Political Party associations, federations, branches, groups and affiliates in order to assist you or maintain contact with you in support of democratic engagement.

Your personal data is only used as outlined here and within your reasonable expectations based on the nature of the communication, and recognising the need of politically related engagement in wider support of democratic engagement.

## **11. Data Rights**

At any point you have the following rights:

- Right of access – you have the right to request a copy of the information held about you.
- Right of rectification – you have a right to correct data held about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data held about you to be erased from our records.
- 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.

## **12. Making a complaint**

If you are unhappy with the way that we have processed or handled your data then you have a right to complain to the Information Commissioner's Office (ICO). The ICO is the supervisory body authorised by the Data Protection Act 2018 to regulate the handling of personal data within the United Kingdom. The contact details for the ICO are:

- Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF
- Telephone: 0303 123 1113
- Website: <https://ico.org.uk/concerns/>

Please note that proof of identity is required should you choose to exercise any of the above rights in relation to personal data.

We retain the right to update this policy at any time.

1 October 2019