

# Office of Charles Walker OBE MP

## Data Protection Policy

This document outlines how the Office of Charles Walker OBE MP processes and manages personal data. It:

- 1) identifies our data controller;
- 2) provides our lawful basis 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 Charles Walker OBE MP.

### 2. Lawful basis for processing

- i. Casework is processed primarily under the lawful basis of public task, with exceptional cases processed under the lawful basis of consent.
- ii. 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

Personal data is stored electronically and securely on our computer systems. Any paper records are stored in a locked filing cabinet.

#### Casework

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

- Names, addresses and email addresses.
- Telephone numbers.
- National Insurance Numbers, Passport Numbers.
- Special category data, outlined in point 4.

#### Policy

Policy casework is stored on the same CMS application. This information predominantly includes but is not limited to:

- Names, addresses and email addresses.
- Telephone numbers.
- Special category data on political beliefs.

### 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 lawful basis 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 offenses

- Physical and mental health

## **5. Data retention policy**

Our office will not normally retain your personal data for a period exceeding three years.

## **6. Subject Access Requests**

We will comply with 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 which can be found on Charles's website at <http://www.charleswalker.org/privacy>