



MALMESBURY
TOWN COUNCIL

Data Protection Policy

1. Your personal data – what is it?

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession. The processing of personal data is governed by the General Data Protection Regulation (the "GDPR").

2. Who are we?

The Town Clerk for Malmesbury Town Council is the Data Controller (contact details below). This means they decide how your personal data is processed and for what purposes.

3. How do we process your personal data?

Malmesbury Town Council complies with its obligations under the "GDPR" by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

In the normal course of business, the Town Council will receive personal data in connection with the following Council activities:

- Administration of room hire
- Administration of the cemetery
(Note: the Data Protection Act does not apply to the records of those who are interred at the cemetery)
- Administration of employment matters
- Correspondence sent to the Council
- Volunteer lists for specific activities/events

Sharing your personal data

Any personal data will be treated as strictly confidential, and it is not passed onto a third party without the express consent of the data subject

4. Where is personal data held?

All Council paper documents are stored in filing cabinets in the Council office or older documentation held in the Wiltshire & Swindon History Centre. All Council electronic records are stored within Microsoft 365. Council staff access data using Council-managed devices protected by centrally managed anti-malware software, full disk encryption, and device management controls.

Council data is stored within Microsoft 365 services, including SharePoint Online for shared documents, Exchange Online for email, Microsoft Teams for collaboration, and OneDrive for individual user files and folders.

In addition to Microsoft's native resilience and recovery features, Council data is protected by an independent cloud-to-cloud backup solution, with backup data stored separately from the primary Microsoft 365 environment.

Backup restore points are retained in accordance with the following schedule:

0 to 1 month: three restore points per day

1 to 3 months: one restore point per day

3 to 12 months: one restore point per week

Over 12 months: one restore point per month

This provides the Council with the ability to recover data from a range of historical points in time in the event of accidental deletion, corruption, malicious activity, or other data loss incidents.

Access to Council data and backup systems is restricted to authorised personnel and protected by appropriate security controls.

5. Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data: -

- The right to request that the data controller provide details for which your personal data is held.
- The right to request deletion of your personal data
- The right to lodge a complaint with the Information Commissioners Office.

6. Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Protection Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

7. Contact Details

To exercise all relevant rights, queries or complaints, please in the first instance contact the Town Clerk of Malmesbury Town Council.

Town Clerk

Claire Mann

Telephone: 01666 822143

Email: claire.mann@malmesbury.gov.uk

Website: [Malmesbury Town Council - HOME](#)