

## **Room Booking Privacy Policy**

### **Introduction**

Southend-on-Sea City Council is a registered Data Controller and offers a wide range of services. The Council will only process your personal information in accordance with the requirements of the Data Protection Act 1998. This Privacy notice details all information collected as part of the wider Southend-on-Sea City Council. This includes why personal information is collected and the process of this information, whether it is received by letter, email, face to face or online.

The wider Southend-on-Sea City Council Data Protection Notification is registered with the information Commissioner's Officer and the Notification reference is: **Z6929331**.

### **Who are we?**

Room bookings are owned and managed by Southend-on-Sea City Council providing short- and long-term room hire from council owned venues. This extends to equipment hire. In this privacy policy, the term 'Room Bookings' refers to 'Room Bookings as a service under Southend-on-Sea City Council'. This may also be referred to as 'The Service', 'we', 'our' or 'us'.

If you wish to speak to a Data Protection Officer with any questions or concerns regarding your personal data, please contact [dataprotection@southend.gov.uk](mailto:dataprotection@southend.gov.uk).

### **What is personal information?**

The privacy policy applies to personal information of a living person that when collated can form an identity to a person. This may be your name or contact details. Some personal information may be sensitive and require special protection to ensure that it is not widely shared. Categories that provide an example of this are:

- Criminal History
- Sexuality and sexual health
- Religious or philosophical beliefs
- Ethnicity
- Genetic/biometric data
- Political opinion
- Physical or mental health
- Trade union membership

### **What information is collected?**

- Contact Information (Name, Address, Email Address, Telephone Number)
- Business information – For account services to provide the best price for a service most relevant to the customer.
- Information an individual submits, emails, calls, posts (on social media), Posts (Letter/ written format) or provides us with. This includes other personal data that you may provide when using the services associated with us at any time.

- Service Information – Including hospitality, equipment, rooms required, costs, quantities, location and feedback on the service including answers & comments.
  - Payment information – The type of secure methods of payment & confirmation of payment from the Southend City Council Finance Department. This is for processing purposes only.
  - Information regarding Health - regarding access requirements, hearing loop facilities, any publications required in alternative reading formats or if an incident occurs at The Civic Centre's commercial areas that requires investigation.
  - CCTV Images – for public safety.
  - Electronic Communications sent by us, including if this has been interacted with through links or replying.
- We will not ask for anything that is not necessary for the service we are providing to you.

## Marketing

We may call or email individual customers or businesses if you select to 'Opt-in' to the specific marketing listed on the online forms when processing a booking or by sending a requested to be contacted for marketing purposes to [RoomBookings@southend.gov.uk](mailto:RoomBookings@southend.gov.uk). By selecting to either be contacted by telephone or email, regarding the service for special offers, your name or business name will be added to a database highlighting that you gave **specific consent**. The database details contact information, the date this was approved and how consent was obtained. Individuals can 'Opt-out' of emails and telephone marketing communications by replying to the email with this request or for an email to be sent to [RoomBookings@southend.gov.uk](mailto:RoomBookings@southend.gov.uk). Telephone lists will also be checked against the Telephone Preference Service (TPS) or the Corporate Telephone Preference Service (CTPS) and if a telephone number is listed on either of these sites, you will not be contacted.

Anyone who wishes to 'Opt-out' will be put on a do not contact list to ensure this is not repeated. By choosing to 'Opt-in' to email & telephone marketing this is separate to the information received regarding a specific booking or for being contacted by us to tell you about important communications that may affect you and will be for direct marketing purposes only.

Collated statistics are also collected from the internal systems Stopford & My Southend; however, any data used for our marketing is anonymized and looked at as a collective sample group. Collated statistics are also gathered from social media using their third-party analytic tools, this includes but is not limited to Twitter, Facebook, Instagram, Pinterest, google +, LinkedIn, YouTube, Flickr. Please be aware that these third-party sites may use cookies and will have their own privacy policy. We also use Google Analytics on the Southend City Council Website to review website traffic and is collated data only. When visiting our websites, you may also be providing us with certain information through our use of website 'cookies'. You can find out more about this in the cookie information on the Southend City Council websites. Photographs may be required for promotional materials and specific consent will be obtained with a form prior to photographing a session.

Where GDPR does not cover specific aspects of marketing & communications, where appropriate, we follow the Privacy and Electronic Communications Regulations (PECR). We will ask for specific consent in regard to direct marketing. Market research does not count as direct marketing, however, when researching; this will not include any promotional materials or campaigns. Data gathered for market research will not be used for any direct marketing.

To summarise, we may offer you opportunities to hear about events and services provided by the Council and our partners. When we do, we will ask for your consent to do so and we will offer you a clear opportunity to 'Opt-out' at any time. We do not sell your personal information to anyone else.

### **Why is the information collected?**

Information is collected to provide, deliver and manage a service through entering into a contract. This may be that you or a legal representative has given consent to provide information. The information may also be used for training purposes for those employees within the Team to develop the service that is provided. This includes any specific cases that may need further analysis in the event of a complaint or to make changes to a booking. Data will be collected for assessing spending and the quality of services by reviewing the volume and quantities used. Information may also be used in terms of planning for new services through research and archiving information.

The data provided to us is only used for the intended purpose and if we wish to use it for another purpose we will first see the permission of those who supplied the information. In some cases, disclosure of your data may be required or permitted under the Act without your specific consent, for example if we have a legal obligation to do so.

It may also be necessary to use personal data:

- To be able to perform statutory duties.
- To protect someone in an emergency or associated health and social care services.
- Data may be used if you have made your information publicly available.
- Data may be required for legal cases.
- It will benefit or protect society or public health as a whole.

If you have given us consent to use your personal information, you have the right to withdraw it at any time by contacting a data protection officer at

[dataprotection@southend.gov.uk](mailto:dataprotection@southend.gov.uk).

### **Who might we share the information with?**

Information will be shared amongst the Team to provide a room hire service. Data may also be shared with Data Protection Officers that work under Southend City Council should this be necessary. The finance team will also provide data to detail the secure payment method and acknowledge confirmation of payment has been received. Only collated Data may be shared with internal teams in Southend City Council, sourced by us from using the online systems My Southend and/or Stopford.

Data may also be shared where there is a legal obligation to do so or where you have requested us to do so.

Here is an overview of who we may share your information with, for example:

- Any of your family, associates, or someone who represents you, where you have asked us to do so
- Our employees to provide you with services or support
- Internal departments and other organisations for statistical and analytical purposes
- Our contractors to help us provide you with our services
- Credit reference and fraud prevention agencies in order to help prevent and detect fraud or as part of our debt collection service
- External agencies like the police, fire service or other councils
- Any person or organisation where we are required to because of a court order, legal duty or statutory obligation

We are careful to keep to a minimum such sharing; whenever we share your information, we do everything we can to make sure it is protected.

### **Transfer of information abroad**

The majority of the personal information we store is held on systems in the UK. But there are some occasions where your information may leave the UK either in order to get to another organisation or if it is stored in a system outside of the EU. We will have additional protections for your information if it leaves the UK ranging from secure ways of transferring information to ensuring we have a robust contract in place with that third party. We will take all practical steps to make sure your personal information is not sent to a country that is not seen as 'safe' either by the UK or EU Governments.

### **What we will do with the information and how will it be used?**

All personal data given will follow the current data protection act 1998 and will be used as stated in this privacy policy. Information will only be collected and used as **necessary** to provide a service to you. This includes using the data from an initial enquiry, to taking payment, service preparation and service delivery.

Data will only be used for the **legitimate interests** in providing a service. This includes but is not limited to safety; security, legal obligations, training, identity checks, financial needs, CCTV for protection, health & safety, risk assessments, area management, Information regarding the service, confirmation, administrative needs, queries, complains, lost property, requesting contact to be made by us, processing surveys, marketing the service including sending communications and processing interest, creating custom marketed audiences on third party social media website to profile and communicate messages regarding the service, to market research and create statistical analysis to review the service for improvements, review and generate customer accounts to make the service bespoke to service needs, best practice or any other enquiry made by you that may require further investigation. Marketing communications will only be sent based on **your consent**. We will need your **explicit consent**, in regards to health and any additional requirements needed to access the service and if needed to investigate an incident.

Explicit consent can be given by detailing the information on our online forms or through emailing [RoomBookings@southend.gov.uk](mailto:RoomBookings@southend.gov.uk).

We make every effort to keep all data secure through paper and electronic means. The data will only be made available to those who have a right or specific purpose to use the data. Data will be kept safe through controlling access to areas, systems and networks. We attend training in how to be aware of how to handle information and the reporting procedures to follow if necessary.

Regular technology updates and working practices will be followed so as to make every effort to keep data secure.

We also follow Southend-on-Sea City Council's Privacy Notice of keeping information secure:

- We have robust technical security such as passwords and information encryption
- We have policies and procedures to make sure your information is only available to our employees who need to see it to do their job, and we train these employees appropriately.
- We establish robust procedures and contracts to extend these protections to any other person or organisation we made need to give your information to.

### **How to access the information held about them? (Data Subject Rights)**

You are entitled to copies of any information that is held about you. This can be obtained by making a request in writing by using a Subject Access Request form located on the Southend-on-Sea City Council by following this link: [Requesting your Information](#).

Subject access requests may take 30 days for a response.

There are four main reasons that information can be refused under a Subject Access Request which includes:

It also involves other people, and it would not be fair to disclose it.

Disclosing it would prejudice the prevention or prosecution of crime.

Disclosing it would prejudice the assessment or collection of tax or duty.

Disclosure could be harmful to the requestor or someone else.

If information needs updating, please contact a data protection officer at [dataprotection@southend.gov.uk](mailto:dataprotection@southend.gov.uk) to discuss your request.

### **Your individual rights**

You have the following rights over the use of your personal information:

- **The right to be informed** – being told about the type of information we collect and how we use and look after it
- **The right of access** – being given a copy of the personal information we hold about you
- **The right to rectification** – having inaccurate personal information corrected

- **The right to erase (the right to be forgotten)** – having personal information deleted from records or records deleted entirely
- **The right to restrict processing** – requiring us to store but not use personal information concerning you
- **The right to data portability** – being provided with an electronic copy of certain records to use for a different purpose
- **The right to object** – to put a case forward for stopping processing your personal information, including for marketing
- Rights in relation to **automated decision making and profiling** – to have a human reconsider automated decisions and profiling.

There are rules concerning when the different rights can be used, you can find out more in our [The Individual Rights of Data Subjects – Policy and Procedure](#).

### **How long do we keep the information?**

There's often a legal or operational reason for keeping your personal information for a set period of time, you can find more detailed information on this in our retention schedules. Records which are no longer needed will be disposed of, deleted or anonymised.

### **How do I withdraw consent, limit use of personal data or rectify incorrect information?**

You can ask to change information you think is inaccurate, you should let us know if you disagree with something we have on record about you. We may not always be able to change or remove that information, but we'll correct factual inaccuracies and may include your comments in the record to show that you disagree with it.

Please let us know if your mobile phone, email address or other contact information changes so that we can keep this information up to date.

Everyone has the right to limit the use of personal data or to withdraw consent.

Should you wish to limit or discuss the data held by us, please contact [RoomBookings@southend.gov.uk](mailto:RoomBookings@southend.gov.uk). Further advice may be sought from a Data Protection Officer at Southend-on-Sea City Council.

Please note that data may still be needed to legal purposes including but not limited to protecting others. Collated Statistical data cannot be deleted as this would make the information invalid.

By limiting or removing data this may cause delays or prevent a service from being delivered. Therefore, where possible we will follow your request.

**Who you can contact about data protection and your rights**

If you have a question about anything covered in this privacy notice you can email the Data

Protection officer at [dataprotection@southend.gov.uk](mailto:dataprotection@southend.gov.uk)

For independent advice about data protection, privacy and data sharing issues, or to lodge a complaint about how we have handled your information, you can contact the Information Com-missioner's Office (ICO):

You can visit [ico.org.uk](http://ico.org.uk) or email [casework@ico.org.uk](mailto:casework@ico.org.uk)

Alternatively, you can write or telephone:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number.