

Data Protection Policy

This document outlines how the Office of Tom Tugendhat 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

1. Data Controller

The Data Controller is Tom Tugendhat MP

2. Lawful basis for processing

- a). Casework is processed under the lawful basis of public task with some cases processed under the lawful basis of consent
- b). Personal data contained in the non-political Tom Tugendhat MP Mailing List are processed under the lawful basis of public task. This does not fall within the definition of direct marketing
- c). We undertake to always act within the reasonable expectations of residents and any other individuals about whom personal data is held

3. What data are held

This office holds personal data that is supplied to Tom Tugendhat in his capacity as a Member of Parliament. This includes data from the electoral register. It also includes information in relation to issues which Tom has been asked to pursue.

This office uses a Casework Management System to help with the management of records and data are also stored in Microsoft Outlook.

Tom also maintains a mailing list where subscribers receive regular updates about his work as a Member of Parliament. Residents' names, postcodes and e-mail addresses are collected.

4. Special category data we hold.

The office may also hold special category data for some data subjects. This type of data will be processed under the lawful basis previously indicated, as permitted in clauses 23 and 24 of schedule 1 of the Data Protection Act. Data may include:

- Political opinions
- Religious beliefs

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

5. **Data retention policy**

This office will hold personal data for as long as Tom Tugendhat remains a Member of Parliament. This is because queries are often revisited to provide the best service possible to residents. In some instances, concerns take a number of years to resolve. It is considered reasonable to keep data for Tom Tugendhat's duration as an MP

6. **Subject Access Requests**

We will comply with Subject Access Requests in line with the guidance given by the Information Commissioners Office. We will respond as quickly as possible, usually within 30 calendar days, and we will request verification of the identity of any individual making a request and ask for further clarification and details if needed.

Data Subjects have the right to the following:

1. To be told whether any personal data are being processed
2. To be given a description of the personal data, the reasons for processing this data and whether the data will be given to another organization or person
3. To be given a copy of the information comprising the data, and given details of the source of the data that is available.

7. **Privacy notice**

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

1. Make public the privacy notice on Tom's website www.tomtugendhat.org.uk
2. Add a link to the privacy notice to all e-mail signatures used by Tom and his parliamentary staff

Privacy Notice

Office of Tom Tugendhat MP

Privacy Notice

This privacy notice relates to the personal data processed by the Office of Tom Tugendhat MP

Who is the Data Controller?

The Data Controller is Tom Tugendhat MP

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 casework and respond to policy queries, for which we must process personal data of residents. We also manage a non-political mailing list for the purpose of sending Tom's e-newsletter. We also contact residents about local issues to provide information and gather views so Tom can best represent them.

How do we process data?

This office processes resident's personal data under the lawful basis of public task. On occasion, a member of this office will contact you to establish consent if this is required. 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.

What information do we hold about you?

This office holds personal data supplied to Tom Tugendhat in his role as a Member of Parliament. This includes data from the electoral register as well as information supplied by residents in relation to matters he has been asked to pursue.

Will we share your data with anyone else?

If you have contacted this office about a personal or policy issue, we may pass your personal data on to a third party in the course of dealing with the matter, such as a local authority, government agency, public body, health trust, regulator or other party. Any third party 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 their procedures.

We will not share the personal information of those subscribers to Tom's mailing list. We will also 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, this office will hold your personal data for as long as Tom Tugendhat remains a Member of Parliament. This is because queries are often revisited to provide the best service possible to residents. In some instances, concerns

take a number of years to resolve. It is considered reasonable to keep data for Tom Tugendhat's duration as an MP

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 this office by:

Letter to House of Commons, London, SW1A 0AA or 130 Vale Road, Tonbridge, Kent, TN9 1SP

E-mail to tom.tugendhat.mp@parliament.uk

Telephone to 0207 219 4727 or 01732 441563

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