



## **Privacy Notice for Customers of Concern**

### **Why we are collecting your data**

Lewes District Council and Eastbourne Borough Council are data controllers and hold a Customers of Concern Register containing details of persons they consider pose a possible threat to the health, safety or security of its employees and/or contractors.

### **What is the legal basis for processing this data?**

The legal basis we rely on to process this personal data is article 6(1)(e) of the GDPR, which allows us to process personal data when this is necessary to perform our public tasks as local authorities. We also rely on article 6(1)(d) as the processing is necessary in order to protect the vital interests of a data subject or of another natural person.

### **Who will your information be shared with?**

This personal information is kept on a database that is only accessible by officers that have a need to know.

To help protect our contractors' employees when carrying out work for the councils, we will make available to them certain personal data relating to persons on the Register, with whom they are likely to come into contact in the course of their council work. We hold data sharing agreements with these companies in order to do so.

The councils are required by law to protect the public funds they administer. We may use any of the information provided for the prevention and detection of fraud. We may also share information with other bodies that are responsible for auditing or administering public funds, including the Cabinet Office.

### **We will not**

- Use your information for marketing or sales purposes without your prior explicit consent.
- Send or store your data abroad.
- Make decisions about you based on automated processing.

### **How long will we hold your data for?**

We will keep your data on the Customers of Concern register for one year after inclusion and then the case will be reviewed. If it is decided a customer no longer needs to be included on the register the personal data on the register will be deleted. Entries will be reviewed on an annual basis.

### **Your rights**

You are entitled to request a copy of any information about you that we hold.

If the information we hold about you is inaccurate you have a right to have this corrected and you have the right to request completion of incomplete data.

You have the right to request that we stop, or restrict the processing of your personal data, in certain circumstances. Where possible we will seek to comply with your request, but we may be required to hold or process information to comply with a legal requirement.

You have the right to object to the processing of your personal data in certain circumstances. We may still be required to hold or process information if there are legitimate grounds for doing so.

If you are dissatisfied with how the councils have used your personal information you have a right to complain to the Information Commissioner's Office at [casework@ico.org.uk](mailto:casework@ico.org.uk)

**Identity of Data Protection Officer**

Oliver Dixon, Senior Lawyer

**Contact details**

Town Hall, Grove Road, Eastbourne BN21 4UG

Email: [accesstoinformation@lewes-eastbourne.gov.uk](mailto:accesstoinformation@lewes-eastbourne.gov.uk)

Tel: 01323 410000