

**Sir Peter Bottomley**

**Data Protection Policy**

This document outlines how the Office of Sir Peter Bottomley processes, manages, and stores personal data. It:

1. Identifies the 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.
7. Contains a copy of our privacy notice.

**1. Data Controller**

The Data Controller is Sir Peter Bottomley.

**2. Lawful Basis for Processing**

1. Casework is processed primarily under the lawful basis of public task and in the public interest, with exceptional cases processed under the lawful basis of consent.
2. Personal data contained in the non-political Sir Peter Bottomley Mailing List is processed under the lawful basis of public task. It does not fall within the definition of direct marketing.
3. 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. We also store paper files of some casework related information, documents and correspondence in secure and locked cabinets. Our systems and filing units are in offices which are locked when unattended.

Casework

The Office uses a CMS (Content Management System) application, Cross Reference, 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.
* Reference numbers relating to ongoing cases, applications and correspondence
* National Insurance Numbers, Passport Numbers.
* Special category data, outlined in point 4.

Policy

Policy casework is stored on Microsoft Outlook as well as Cross Reference.

This information predominantly includes but is not limited to:

* Names, addresses and email addresses.
* Telephone numbers.
* Special category data on political beliefs.
* National Insurance numbers, passport numbers and reference numbers relating to cases, enquiries, applications and accounts.

Mailing lists

The Office also maintains a mailing list of subscribers to the Sir Peter Bottomley Mailing List. These subscribers receive Sir Peter’s monthly newsletter and information about Parliamentary activities and events over the month. Personal data we hold in this regard includes:

* Names, addresses and email addresses.

This information is not political in nature and therefore it is not categorised as direct marketing.

**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

The holding of this data will be related to the individual enquiry and constituents can expect that we will not collect this special category data unless it is requested and it is essential to the carrying out of duties related to the initial constituent enquiry.

**5. Data retention policy**

Our office will hold personal data for no longer than one five-year parliamentary term, except for extenuating circumstances or special cases. Casework and policy queries are often revisited to provide the best service and representation for constituents, from whom we may continue to receive correspondence. Therefore, we feel it is reasonable for an elected representative to hold personal data for the duration of a parliamentary term.

**6. Subject Access Requests**

We will comply with Subject Access Requests in line with the guidance given by the Information Commissioners Office (ICO).

1. We will respond as quickly as possible, within 30 calendar days.
2. We will request verification of the identity of any individual making a request, and ask for further clarification and details if needed.
3. Data subjects have the right to the following:
   * 1. To be told whether any personal data is being processed
     2. 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.
     3. 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. We will:

1. Publish our privacy notice on Sir Peter’s website: <https://www.sirpeterbottomley.com/privacy-notice>
2. Add a link to our privacy notice to staff email signatures, and to Sir Peter’s email signature.
3. Add a link to our privacy notice on Sir Peter’s auto-response on Microsoft Outlook.
4. Direct constituents who contact us via letter and telephone to our privacy notice online, of supply them with a paper copy if needed.
5. Modify our voicemail messages to include information about how constituents can read our privacy notice.

**Privacy Notice**

This privacy notice relates to the personal data processed by the Office of Sir Peter Bottomley, Conservative Parliamentary Candidate for Worthing West, in relation to casework and policy queries.

Who is the Data Controller?

The Data Controller is Sir Peter Bottomley, Conservative Party candidate for Worthing West.

What Data do we collect for Casework?

In order to carry out our casework duties we may ask for information such as: full name, address, telephone number, email addresses, date of birth, case or correspondence reference numbers (different in style and purpose depending on the agency and varying from case-to-case), National Insurance Numbers, and Passport Numbers. We may also need to collect some sensitive or ‘special category’ data, depending on the exact nature of your case. This data can include: medical information (mental and physical), political opinions, religious beliefs, Trade Union membership or relating activities, sexual orientation, race and ethnicity information, and criminal history. The information outlined above will be retained and used in a reasonable manner for the sole purposes of assisting with casework and within the reasonable scope of the enquiries relating to your case.

What does the Office do?

The office manages and carries out the duties and functions as an advocate within the role and scope of a candidate for election to the House of Commons. As part of this work, we conduct constituency casework and respond to policy queries, for which we must process personal data of our constituents. We also manage a small, non-political mailing list for the purpose of sending Sir Peter’s E-Newsletter and information about upcoming advice surgeries.

How do we process data?

This office processes constituents’ data under the lawful basis of public task. In instances where this lawful basis is not sufficient and explicit consent is required, a member of the office will contact you to establish your consent.

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.

Will we share your data with anyone else?

If you have contacted Sir Peter about a personal or policy issue, we may pass your personal data on to a third-party in the course of dealing with you, such as local authorities, government agencies, public bodies, health trusts, regulators, and so on. Any third parties 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 our procedures.

We will not share the personal information of members of the Sir Peter Bottomley Mailing List or those in receipt of our E-Newsletter.

Non-constituents contacting Sir Peter with a casework related issue shall be provided with information to help them contact their own representative or candidate for election. Sir Peter will not pass information or correspondence directly on to the appropriate candidate or representative (councillors) and will instead return all information and materials relating to cases to the non-constituent.

In any case, we will 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, our office will hold your personal data for no longer than one parliamentary term, or five years, whichever is shorter.

Casework and policy queries are often revisited to provide the best service and representation for constituents, from whom we may continue to receive correspondence. Therefore, we feel it is reasonable for an elected representative to hold personal data for the duration of a parliamentary term.

Following an election, we will retain personal data for a further three months, during which time constituents can contact us to ask that we retain their data.

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 we collect data

**We collect data about you in the following ways:**

Provided by you (Directly):

* In person, when you speak to one of our representatives or volunteers, or Sir Peter directly
* Through a telephone call, either where you call us or we call you for casework related reasons or otherwise
* On paper, such as if you return a printed survey or a reply slip on a leaflet
* Digitally, such as if you fill in a form on a website or interact with the Party online via our website or social media platforms
* When you offer or ask about volunteering, or take part in party activities
* When you enter into a transaction with the Party or Sir Peter’s campaign, such as donating, joining, purchasing a product or paying for an event
* When you consent to receiving marketing emails etc or joining our mailing list
* When you attend a campaign event

In the event new cases are taken on during the election period, it is important to understand that as Sir Peter Bottomley is not the Member of Parliament, representative duties and advocacy work carried out by him and his team is done so within the capacity of a candidate.