

PENNY MORDAUNT MP
MEMBER OF PARLIAMENT FOR PORTSMOUTH NORTH
Data Protection Policy (FINAL)

This document outlines how the Office of Penny Mordaunt 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 the Subject Access Requests; and
7. contains a copy of our privacy notice.

The policies outlined within this document come into effect on Friday, 25th May 2018.

1. Data Controller

The Data Controller is Penny Mordaunt MP.

2. Lawful basis for processing

- i) Casework and Parliamentary Correspondence is processed primarily under the lawful basis of public task, with exceptional cases processed under the lawful basis of consent
- ii) Personal data contained in the non-political Penny Mordaunt MP Mailing List is processed under the lawful basis of public task. It does not fall within the definition of direct marketing.
- iii) 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

As of the 25th May 2018, the office holds information on approximately 7,000 constituents.

Where possible we operate a paperless office. Personal Data is stored electronically and securely on our computer systems. Our systems are in offices which are locked when unattended.

Where we hold paper files we operate a clear desk procedure, ensuring that all paper files are stored in locked filing systems, when not in use; and when the office is unattended.

We undertake to always act within the reasonable expectations of our constituents and any other individuals about whom we hold personal data.

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Casework

The Office uses a CMS (Casework Management System) application called 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
- National Insurance Numbers, Passport Numbers and Home Office Reference Numbers
- Special Category data, outlined in Point 4

Policy

Policy representations and casework enquiries are stored in a folder system on Microsoft Outlook.

This information predominantly includes but is not limited to:

- Names, addresses and email addresses
- Telephone numbers
- Special category data on political beliefs.

Mailing Lists

The Office also maintains a mailing list of around 900 subscribers to the Penny Mordaunt MP Mailing List. These subscribers receive Penny's newsletter and information about upcoming events and news. Personal Data we hold in this regard includes:

- Names, addresses and email addresses
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 offences
- Physical and mental health

5. Data Retention Policy

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Our office will hold personal data for no longer than one five-year parliamentary term. From 25th May 2018, we will only hold data dating from Monday 11th May 2015 inclusive. Casework and policy queries are often revisited to provide the best service and representation to constituents, from whom we may continue to receive correspondence.

Therefore we believe it is reasonable for an elected representative to hold personal data for the duration of a parliamentary term, and that there will be an expectation from constituents that we will do so.

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

6. Subject Access Requests

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

- i.) We will respond as quickly as possible, within 30 calendar days.
- ii.) We will request verification of the identity of any individual making a request, and ask for further clarification and details if needed.
- iii.) Data subjects have the right to the following:
 - a. To be told whether any personal data is being processed.
 - b. 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.
 - c. To be given a copy of the information comprising their data, and given details of the source of the data where this is available.

7. Privacy Notice

- i) Our office will undertake to ensure all constituents sharing their personal data can have the opportunity to read our privacy notice. We will publish our privacy notice on Penny's website; www.pennymordaunt.com
- ii) Add a link to our privacy notice to staff email signatures, and to Penny's email signature.
- iii) Add a link to our privacy notice on Penny's auto response on Microsoft Outlook.
- iv) Direct constituents who contact us via letter, email or telephone to our privacy notice online, or supply them with a paper copy, if needed.
- v) Modify our voicemail message to include information about how constituents can read our privacy notice.

A copy of our Privacy Notice is provided below:

This privacy notice relates to the personal data processed by the Office of Penny Mordaunt, Member of Parliament for Portsmouth North, in relation to casework and policy queries.

Who is the data Controller?

The Data Controller is Penny Mordaunt MP, Member of Parliament for Portsmouth North

What does the office do?

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The Office discharges the duties and functions of an elected Member of Parliament. As part of this work, we conduct constituency casework and respond to policy queries, for which we must process personal data of constituents. We also manage a small, non-political mailing list for the purposes of sending Penny's Newsletter.

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 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 privacy.

Will we share your data with anyone else?

If you have contacted Penny about a personal or policy issue, we may pass your personal data on to a third party, such as local authorities, government agencies, public bodies, health trusts, regulators and so on. Any third parties we share your data with are obliged to keep your details secure, 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 the Penny Mordaunt MP Mailing List or those in receipt of our Newsletter

We will also not use your personal data in any way that goes beyond your reasonable expectations in contacting us.

For how long will you keep my personal data?

Unless specified, our office will hold 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 believe 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 processing your personal data, you, the data subject, have the following rights:

- Right of access

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- Right of rectification
- Right to be forgotten
- Right to restriction of processing
- Right of portability
- Right to object
- Right to object to automated processing, including profiling
- Right to Judicial Review

How can I contact somebody about my privacy?

You can get in touch with our office by letter, email or telephone using the details at the foot of this page.

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