



**GENERAL DATA  
PROTECTION  
REGULATION  
POLICY & PROCEDURES**

# PRIVACY NOTICE

I am the MP for Aberavon Constituency. As your MP, it is important that I and my office can keep in touch with constituents about my work, take up casework on their behalf and ask for views on local issues.

As a Labour MP I also have access to other information which I or my office, or volunteers working with me, will use for campaigning purposes or for communicating with Labour Party members. In respect of that information, the Labour Party is the data controller, and you should consult their privacy policy (<https://labour.org.uk/privacy-policy/>) for details of what information they hold, why, and how they use and process that information.

This page explains how I collect and use personal data, the legal basis for doing so and provides information about your rights in respect of your personal data for which I am the data controller.

My data protection officer can be contacted at [stephen.kinnock.mp@parliament.uk](mailto:stephen.kinnock.mp@parliament.uk) or on 01639 897660

## Data collection and use

The office of Stephen Kinnock MP will only collect and use personal information for the specific purpose for which it has been obtained.

I will undertake casework using personal information provided by or on behalf of a constituent. It may be necessary for me to share your information with third party organisations. I will only do where it is necessary and reasonable to do so, and I will share only the minimum amount of personal information necessary in order to advocate on your behalf. Please see the "who I share your information with" section for further details.

When registering with this website or by completing a form or survey sent to you by my office, you may be asked for personal information. In each case, I will ask for your explicit consent to use your information, and I will only use it for the purposes for which you provide it.

Our legal basis for processing this personal data is:

- Consent: you have consented to the use of your personal data
- Public task: Where the processing is necessary to perform tasks in the public interest or for official functions as the Member of Parliament.
- Legitimate interest: when the processing is for our legitimate interests and not overridden by your rights.

I may communicate by post, email, 'phone or text message about my work and to give you the latest news on my campaigns and opportunities to get involved, where you have provided explicit consent for me to do so. You may withdraw your consent or unsubscribe at any time from communications in any medium by contacting our Data Protection Officer or by using the unsubscribe option I provide in all communications.

I have a legal entitlement to the full electoral register for my constituency, which includes the full name and address of every registered elector and I may write to you in connection with my activities as an MP.

I will not use personal data for any automated decision making or profiling.

### **Who I share your information with:**

When I take up casework on your behalf, it may be necessary for me to share the details you provide with government departments, local authorities and other public bodies. I will only share as much information as is necessary to take your case forward. If you have any questions or concerns about how information you provide as part of a casework request is used, please contact my Data Protection Officer for more information.

Other than in the circumstances above, I will not share personal information with other organisations without your explicit consent.

In order to communicate with you about my work as the MP for Aberavon Constituency, it may be necessary for me to transfer personal information to countries or jurisdictions outside the EU. In each case, I will take steps to ensure that the suppliers I use comply with the General Data Protection Regulation or are subject to the Privacy Shield scheme agreed between the European Union and the United States.

### **Retention of personal data**

I will only keep your personal information for as long as it is necessary to fulfil the purposes described in this policy. Information relating to casework will only be retained for as long as it is necessary to resolve or otherwise complete your request, although I may retain a minimum amount of information about closed cases in the event that you contact me again for help.

The retention period for the collection of this personal data is 2 years after the closure of the casework, after which the personal data will be disposed of securely.

If you have consented to receive information about my work, I will only retain your personal information so long as I am the MP for Aberavon Constituency, or you ask not to be contacted further.

I will regularly review the personal information I hold to ensure that its use is necessary and proportionate.

### **IP Addresses and Cookies**

This site does not automatically capture or store personal information, other than logging the user's IP Address or the location of your computer or network on the Internet, for systems administration and troubleshooting purposes. I also use IP addresses in the aggregate to track which pages people visit in order to improve the quality of the site.

A cookie is a tiny text file that is stored on your computer. Cookies may be used in order to tailor your experience on this site according to the preferences you have specified. Cookies on this website do not contain personally identifiable information, other than your IP address, which itself is only very rarely enough to identify you as an individual.

### **Links to other websites:**

This website contains links to other websites. I am not responsible for the content or privacy practices of these websites.

## **Your rights:**

You have a number of rights in relation to your personal information and the opportunity to choose how it is used. You can:

- 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: in the event that [Member's office] refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined below.

You may opt out of receiving further communications from me in any medium at any time. All requests to unsubscribe are dealt with promptly, and in all cases within a week.

## **Complaints**

If you wish to exercise your rights in respect of your personal data or have any concerns about how your data is used, please contact my Data Protection Officer:

The Data Protection Officer  
Address: Unit 7 Water Street Business Centre, Water Street, Port Talbot, SA12 6LF  
Email: [stephen.kinnock.mp@parliament.uk](mailto:stephen.kinnock.mp@parliament.uk)  
Telephone 01639 897660

Alternatively you have right to raise any issues or concerns directly with the Information Commissioner's Office.

Information Commissioner's Office  
Address: Wycliffe House, Water Lane, Wilmslow, SK9 5AF  
Website: <https://ico.org.uk/>  
Email: <https://ico.org.uk/global/contact-us/email/>  
Telephone: 01625 545 745

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Telephone: 01625 545 745

# CONSENT PROCEDURE

## Scope

The consent of the data subject is one of the conditions for the processing of his or her personal data and is within the scope of this procedure. Stephen Kinnock MP's Office needs to obtain consent when no other lawful basis applies.

Consent of the data subject is defined by the GDPR as "any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her".

Explicit consent is required for the processing of sensitive personal data. Specific conditions apply to the validity of consent given by children in relation to information society services, with requirements to obtain and verify parental consent below certain age limits.

## Responsibilities

As a data controller, Stephen Kinnock MP's Office is responsible for obtaining consent from the data subject under advisement from Data Protection Officer.

## Consent procedure

Stephen Kinnock MP's Office provides a clear privacy notice wherever personal data is collected (documented on Stephen Kinnock MP's website [INSERT LINK]) to ensure that consent is informed and that the data subject is informed of their rights in relation to their personal data.

Stephen Kinnock MP's Office demonstrates data subject(s) consent to the processing of his or her personal data or explicit consent for sensitive personal data through the completion of a consent statement.

Stephen Kinnock MP's Office demonstrates data subject(s) consent to the processing of his or her personal data for one or more specific purposes through the completion of a consent statement.

Stephen Kinnock MP's Office demonstrates data subject(s) consent is clearly distinguishable from any other matter relating to the data subject (if recorded in paper / electronic file format use the data subject consent statement, or email then attach the email to the form).

Stephen Kinnock MP's Office demonstrates data subject(s) consent is intelligible and accessible using clear and plain language.

Stephen Kinnock MP's Office demonstrates data subject(s) are informed of their right to withdraw consent before giving consent through the completion of a Withdrawal of consent form.

Stephen Kinnock MP's Office demonstrates processing of data is limited to that stated in the contract, bound by the explicit consent given by the data subject.

## Child consent procedure

Where processing relates to a child under the age of consent for processing, Stephen Kinnock MP's Office demonstrates that consent has been provided by the person who is the

holder of parental responsibility over the child, in instances where Stephen Kinnock MP's Office offers services online targeting children.

The Office of Stephen Kinnock MP demonstrates reasonable efforts have been made to verify the age of the child and establish the authenticity of the parental responsibility taking into consideration available technology.

# WITHDRAWAL OF CONSENT PROCEDURE

## Scope

This procedure addresses the data subject(s) right to withdraw consent for the processing of his or her personal data.

Withdrawal of consent by the data subject means an unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies withdrawal of consent to the processing of personal data relating to him or her.

Withdrawal of consent shall be without effect to the lawfulness of processing based on consent before its withdrawal. Whereas consent covered all processing activities carried out for the same purpose or purposes, withdrawal of consent covers all processing activities carried out for the same purpose or purposes.

## Responsibilities

As a data controller, Stephen Kinnock MP's Office, is responsible under the GDPR for administering withdrawal of consent from the data subject under advisement from Data Protection Officer.

## Withdrawal of consent procedure

Stephen Kinnock MP's Office demonstrates the data subject has withdrawn consent to the processing of his or her personal data as recorded in the Withdrawal of consent form.

Where the processing had multiple purposes, Stephen Kinnock MP's Office demonstrates withdrawal of consent for each purpose as recorded in the data subject consent withdrawal form.

The processing activities that relied upon the consent is stopped in accordance with the relevant process. The Data Protection Officer will inform the relevant staff of this change so that processing can be stopped.

## Withdrawal of parental consent procedure

Stephen Kinnock MP's Office demonstrates the holder of parental responsibility over the specified child has withdrawn consent.

Stephen Kinnock MP's Office demonstrates that reasonable efforts have been made to establish the authenticity of the parental responsibility, when withdrawing consent for the specified child, considering available technology.

The processing activities that relied upon the consent is stopped in accordance with the relevant process. The Data Protection Officer will inform the relevant staff of this change so that processing can be stopped.

# SUBJECT ACCESS REQUEST PROCEDURE

## Scope

All personal data processed by Stephen Kinnock MP's Office is within the scope of this procedure.

### Data subjects are entitled to obtain:

- Confirmation as to whether Stephen Kinnock MP's Office is processing any personal data about that individual;
- Access to their personal data;
- Any related information;

## Responsibilities

Stephen Kinnock MP's Office Data Protection Officer is responsible for the application and effective working of this procedure, and for reporting to the information owner on subject access requests (SARs).

The Data Protection Officer is responsible for handling all SARs.

## Procedure

Subject Access Requests can be made using the Subject access request form

The data subject provides Stephen Kinnock MP's Office with evidence of their identity, in the form of two forms of identification, which can be:

- passport;
- driving licence,
- birth certificate;
- utility bill (from last 3 months);
- current vehicle registration document;
- bank statement (from last 3 months)

and the signature on the identity must be cross-checked to that on the application form.

The data subject may specify to Stephen Kinnock MP's Office any specific sets of data held by Stephen Kinnock MP's Office on their subject access request (SAR). Alternatively, the data subject can request all data held on them.

Stephen Kinnock MP's Office records the date on which the data subject provided any identification evidence sought by the controller and any specification of the data sought.

Stephen Kinnock MP's Office provides the requested information to the data subject within one month from this recorded date. There are limited circumstances in which an extension to that one month will be provided; unless these circumstances apply, failure to provide the requested information within that one month is a breach of the GDPR.

Once received, the subject access request (SAR) application is immediately forwarded to the Data Protection Officer, who will ensure that the requested data is collected within the specified time frame above.

Collection entails:

Collecting the data specified by the data subject, or

Searching all databases and all relevant filing systems (manual files) in Stephen Kinnock MP's Office, including all back-up and archived files (computerised or manual) and all email folders and archives. The Data Protection Officer maintains a data map that identifies where all data in Stephen Kinnock MP's Office is stored.

The Data Protection Officer maintains a record of requests for data and of their receipt, including dates.

The Data Protection Officer reviews subject access requests from a child. Before responding to an SAR of a child data subject, the Data Protection Officer must consider the child's legal capacity to make the request.

Data Protection Officer reviews all documents that have been provided to determine whether the identifying information of any third parties is present in it, and removes (if justified) the identifying third-party information from the documentation, obtains written consent from the third party for their identity to be revealed, or includes the information of the third party without their consent (if justified).

If any of the requested data is being held or processed under one of the following exemptions, it does not have to be provided:

- National security
- Crime and taxation
- Health
- Education
- Social Work
- Regulatory activity
- Journalism, literature and art
- Research history, and statistics
- Publicly available information
- Corporate finance
- Examination marks
- Examinations scripts
- Domestic processing
- Confidential references
- Judicial appointments, honours and dignities
- Crown of ministerial appointments
- Management forecasts
- Negotiations
- Legal advice and proceedings
- Self-incrimination
- Human fertilisation and embryology
- Adoption records
- Special educational needs
- Parental records and reports

In the event that a data subject requests Stephen Kinnock MP's Office to provide them with the personal data stored by the controller/processor, then Stephen Kinnock MP's Office will provide the data subject with the requested information in electronic format, unless otherwise specified. All of the items provided to the data subject are listed on this schedule that shows the data subject's name and the date on which the information is delivered to, and received by, the data subject.

In the event that a data subject requests what personal data is being processed the Stephen Kinnock MP's Office provides the data subject with the following information:

- Purpose of the processing
- Categories of personal data
- Recipient(s) of the information, including recipients in third countries or international organisations
- How long the personal data will be stored
- The data subject's right to request rectification or erasure, restriction or objection, relative to their personal data being processed.
  - Stephen Kinnock MP's Office will remove personal data from systems and processing operations as soon as a valid request for erasure has been submitted by the data subject.
  - Stephen Kinnock MP's Office contacts and communicates via email, in writing or via 'phone, with other organisations, where the personal data of the data subject is being processed, to cease processing information at the request of the data subject.
  - Stephen Kinnock MP's Office takes appropriate measures without undue delay in the event that the data subject has: withdrawn consent (see Withdrawal of consent procedure and form); objects to the processing of their personal data in whole or part; no longer under legal obligation and/or has been unlawfully processed.
- Inform the data subject of their right to lodge a complaint with the supervisory authority and a method to do so (see Complaints procedure).
- Information on the source of the personal data if it hasn't been collected from the data subject.
- Inform the data subject of any automated decision-making.
- If and where personal data has been transferred and information on any safeguards in place.

Stephen Kinnock MP's Office uses the following electronic formats to respond to SARs:

- Email

# PERSONAL DATA BREACH NOTIFICATION PROCEDURE

## Scope

This procedure applies in the event of a personal data breach under Article 33 of the GDPR – Notification of a personal data breach to the supervisory authority – and Article 34 – Communication of a personal data breach to the data subject.

The GDPR draws a distinction between a 'data controller' and a 'data processor' in order to recognise that not all organisations involved in the processing of personal data have the same degree of responsibility. A member's office is always a data controller.

## Responsibility

All users (whether Employees, contractors or temporary Employees and third party users) of Stephen Kinnock MP's Office are required to be aware of, and to follow this procedure in the event of a personal data breach.

All Employees, contractors or temporary personnel are responsible for reporting any personal data breach to the Data Protection Officer.

## Procedure – Breach notification data controller to supervisory authority

Stephen Kinnock MP's Office determines if the Information Commissioner's Office (ICO) need to be notified in the event of a breach.

Stephen Kinnock MP's Office assesses whether the personal data breach is likely to result in a risk to the rights and freedoms of the data subjects affected by the personal data breach, by conducting data protection impact assessment against the breach.

If a risk to data subject(s) is likely, Stephen Kinnock MP's Office reports the personal data breach to the ICO without undue delay, and not later than 72 hours.

If the data breach notification to the supervisory authority is not made within 72 hours, Data Protection Officer submits it electronically with a justification for the delay.

If it is not possible to provide all of the necessary information at the same time Stephen Kinnock MP's Office will provide the information in phases without undue further delay.

The following information needs to be provided to the supervisory authority:

- A description of the nature of the breach.
- The categories of personal data affected.
- Approximate number of data subjects affected.
- Approximate number of personal data records affected.
- Name and contact details of the Data Protection Officer
- Consequences of the breach.
- Any measures taken to address the breach.
- Any information relating to the data breach.

The Data Protection Officer notifies the ICO. Contact details for the ICO are available on the ICO's website: <https://ico.org.uk/for-organisations/report-a-breach/>

In the event the ICO assigns a specific contact in relation to a breach, these details are recorded in the internal data breach register and breach notification form.

The breach notification is made by email, 'phone call or in writing

A confirmation of receipt of this information is made by email, 'phone call or in writing

### **Procedure – Breach notification data controller to data subject**

If the personal data breach is likely to result in high risk to the rights and freedoms of the data subject, Stephen Kinnock MP's Office notifies those/the data subjects affected immediately in accordance with the Data Protection Officer recommendations.

The notification to the data subject describes the breach in clear and plain language, in addition to information specified above.

Stephen Kinnock MP's Office takes measures to render the personal data unusable to any person who is not authorised to access it using encryption.

Stephen Kinnock MP's Office takes subsequent measures to ensure that any risks to the rights and freedoms of the data subjects are no longer likely to occur by 72 hours.

If the breach affects a high volume of data subjects and personal data records, Stephen Kinnock MP's Office makes a decision based on assessment of the amount of effort involved in notifying each data subject individually, and whether it will hinder Stephen Kinnock MP's Office ability to appropriately provide the notification within the specified time frame. In such a scenario a public communication or similar measure informs those affected in an equally effective manner.

If Stephen Kinnock MP's Office has not notified the data subject(s), and the ICO considers the likelihood of a data breach will result in high risk, Stephen Kinnock MP's Office will communicate the data breach to the data subject by 72 hours.

Stephen Kinnock MP's Office documents any personal data breach(es), incorporating the facts relating to the personal data breach, its effects and the remedial action(s) taken.

# COMPLAINTS PROCEDURE

## Scope

This procedure addresses complaints from data subject(s) related to the processing of their personal data, Stephen Kinnock MP's Office's handling of requests from data subjects, and appeals from data subjects on how complaints have been handled.

## Responsibilities

All Employees are responsible for ensuring any complaints made in relation to the scope of this procedure are reported to the Data Protection Officer.

Data Protection Officer is responsible for dealing with all complaints in line with this procedure.

## Procedure

Stephen Kinnock MP's Office has the contact details of its Data Protection Officer published on its website ([www.stephenkinnock.co.uk](http://www.stephenkinnock.co.uk)), clearly under the 'Contact us' section.

Stephen Kinnock MP's Office has clear guidelines on this page [URL] and [contact us form], which is sent directly to the Data Protection Officer, that enable the data subject to lodge a complaint.

Stephen Kinnock MP's Office clearly provides data subject(s) with the Privacy notice which can be found on [LINK], clearly under the 'Contact us' section.

Data subjects are able to complain to Stephen Kinnock MP's Office about:

- how their personal data has been processed
- how their request for access to data has been handled
- how their complaint has been handled
- appeal against any decision made following a complaint.

Data subject(s) lodging a complaint with the Stephen Kinnock MP's Office Data Protection Officer are able to do so by contact form published [http://www.stephenkinnock.co.uk/contact\\_us](http://www.stephenkinnock.co.uk/contact_us) on the Member's office website, and/or via email direct to the Data Protection Officer as published [LINK] on the Stephen Kinnock MP's website.

Complaints received via the contact form are directed to the Data Protection Officer for resolution.

Complaints are to be resolved within 28 days.

Appeals on the handling of complaints are to be resolved within 28 days.

If Stephen Kinnock MP's Office fails to act on a data subject's access request within 28 days, or refuses the request, it sets out in clear and plain language the reasons it took no action/refusal. Stephen Kinnock MP's Office will also inform the data subject(s) of their right to complain directly to the Information Commissioner's Office (ICO). In doing so, Stephen Kinnock MP's Office provides the data subject(s) with the contact details of the ICO and informs them of their right to seek judicial remedy.

