

# Cinderford Town Council

## Wifi Privacy Policy

We take the privacy of our wifi service users very seriously. We ask that you read this Privacy Policy ('the Policy') carefully as it contains important information about how we will use your personal data.

For the purposes of the Data Protection Act 1998, Cinderford Town Council ('we' or 'us') is the 'data controller' (that is, the organisation who is responsible for, and controls the processing of, your personal data). We are registered as a data controller with the Office of the Information Commissioner and our registration number is Z3015975.

By using our wifi service you consent to the collection, use and disclosure of your personal information in accordance with this Policy.

### Personal data we may collect about you

1. We may obtain your personal data (such as your name, postcode and email address) when you sign up to use our wifi service or contact us by telephone, email or post. The personal data we hold on you will be adequate, relevant and not excessive.
2. We may monitor your use of our wifi service by recording how many times you use the wifi service, where you use it, at what times you use it, the quantity of data traffic in and how long each session lasts. This information helps us to build a profile of our users for statistical purposes and to improve how we provide our wifi service to you. Most of this data will be aggregated into groups, which means that we will not be able to identify you individually.

### How we use your personal data

3. We will use your personal data in accordance with your legal rights under the Data Protection Act 1998. For more information about data protection see <http://www.ico.org.uk>.
4. We may use your personal data for these purposes:
  1. to enable you to connect to our wifi service
  2. to help us identify you while you use our wifi service
  3. to identify in which areas our users live
  4. administration
  5. research, statistical analysis and behavioural analysis
  6. fraud prevention and detection
  7. to notify you of any changes to our wifi service which may affect you
  8. security vetting
  9. improving our service
  10. requesting feedback from you
  11. responding to your emails, submissions, questions, comments, requests and complaints
  12. sending you information about what is happening in Cinderford

### Direct communications and opting out

5. We will contact you by email only to give you information about what is happening in Cinderford if you agreed to this when you signed up to use our wifi service. If you have changed your mind

and would prefer us not to contact you, then you can opt out at any time. See further 'Your rights' below.

## **Disclosure of your personal data**

6. We may disclose your personal data for processing to:
  1. our partners (and their staff) who help us provide our wifi service to you.
  2. our staff
  3. government bodies and law enforcement agencies in connection with any investigation to help prevent or detect unlawful activity and in response to legal or regulatory requests
  4. other third parties in connection with possible legal proceedings
  5. other third parties in emergency situations
7. We may also share information or statistics with third parties in an aggregated or anonymous form that does not directly identify you.
8. Subject to us complying with our obligations under the Data Protection Act 1998, we are not responsible for the actions of service providers or other third parties using your personal data.

## **Keeping your data secure**

9. We will use technical and organisational measures to safeguard your personal data, for example:
  1. we store your personal data on secure servers
  2. all our staff are aware that they must respect the confidentiality of your personal data.
10. Whilst we will use all reasonable efforts to safeguard your personal data, you acknowledge that use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal data which are transferred from you or to you via the Internet while using our wifi service.

## **Information about other individuals**

11. If you give us someone else's personal information, you confirm that the other person has appointed you to act on his/her behalf and has agreed that you can consent on his/her behalf to the processing of his or her personal data.
12. We are not liable to any third parties for using their personal data, where they have not given you consent to give us their personal data.

## **Your rights**

13. You have the right, subject to the payment of a small fee (currently £10) to request access to personal data which we may process about you. If you wish to exercise this right, known as a subject access request, you should:
  1. put your request in writing
  2. include proof of your identity and address (e.g. a copy of your driving licence or passport, and a recent utility or credit card bill)
  3. attach a cheque in the amount of £10 made payable to Cinderford Town Council
  4. specify the personal data you want access to
14. You have the right to require us to correct any inaccuracies in your data free of charge. If you wish to exercise this right, you should:
  1. put your request in writing
  2. provide us with enough information to identify you (for example your name and email address)

3. specify the information that is incorrect and what it should be replaced with.
15. You also have the right to ask us to stop processing your personal data for direct communication purposes. If you wish to exercise this right you should:
  1. put your request in writing (an email sent to [clerk@cinderfordtc.co.uk](mailto:clerk@cinderfordtc.co.uk) with a header that says 'Unsubscribe' is acceptable)
  2. provide us with enough information to identify you (for example your name and email address)
16. We are not responsible for the privacy policies and practices of websites and apps you may access through our wifi service. If you have concerns or questions about their privacy policies and practices, you should contact the website operator or publisher.
17. We may change this privacy policy from time to time. You should check this policy occasionally to ensure you are aware of the most recent version which will apply each time you access our wifi service.
18. We are not responsible for cookies stored on your device or hardware from websites you visit while using our wifi service.

## **Our contact details**

We welcome your feedback and questions. If you wish to contact us, please send an email to [wifi@cinderfordtowncouncil.gov.uk](mailto:wifi@cinderfordtowncouncil.gov.uk)