

# Privacy Notice

This document describes how and why we collect, store, protect, process and share the data you give to us. We process personal data in this case to help facilitate the provision of free books for children in West Berkshire as part of the Imagination Library.

Date of Issue: 26 Jun 2020

Update History:

26 Jun 2020	First issue of a new Privacy Notice
13 April 2022	Minor amendment to contact details of the Data Protection Officer

Directorate: Communities  
Service: Education  
Team: Virtual School

## About the Organisation

West Berkshire Council is the Data Controller. This means it is ultimately responsible for the data it holds about you.

Contact Address:

West Berkshire Council  
Market Street  
Newbury  
Berkshire  
RG14 5LD

ICO Registration Number: **Z6825178**  
<https://ico.org.uk/ESDWebPages/Entry/Z6825178>

## The Data Protection Officer

Contact details for the Data Protection Officer at the Council can be found at:  
[www.westberks.gov.uk/dpofficer](http://www.westberks.gov.uk/dpofficer)

## What data will we collect about you?

We will process the date of birth, and address of each eligible child in the care of West Berkshire Council under the age of five years old.

We will already hold this data in most cases as part of your child's involvement with council services; if there is anything additional we need to get the scheme set up for your child (beyond your consent) we will contact you directly to discuss.

## What will we use your data for?

We will use this data to give your child the opportunity to receive, through the post, and completely free of charge, a book every month until their fifth birthday.

### **Who will see your data?**

The data will be shared with the Imagination Library, part of the Dollywood Foundation, who are funding the scheme, and their dispatch company.

The Dollywood Foundation are a registered charity, number **1121917**.

They have provided a number of resources that explain what happens to your data when it is passed into their care by West Berkshire Council.

You can read more here:

<https://imaginationlibrary.com/gdpr/>

### **Legal Basis for Processing**

Under the GDPR, the council must identify a legal basis for processing your child's data as part of this activity. In this context, we ask for your explicit consent (which is described as a legitimate basis for processing under Article 6a of the GDPR) to participate into the scheme.

If you do not wish for your child to receive the free books, you just need to indicate this to us and we will not pass their data to the Dollywood Foundation.

Because data relating to children under the age of 5 is reasonably considered to be "Special Category", the council will also rely on Article 9, 2a of the GDPR.

You have a number of rights that can be exercised with this data – see "Your Rights" below.

### **How long will your data will be kept?**

West Berkshire Council only keeps data for as long as is necessary. However, the data passed to the Dollywood Foundation would be subject to their retention schedules to allow them to run the scheme (these are detailed at <https://imaginationlibrary.com/privacy-policy> ; the Foundation indicates that data will only be held in an identifiable form up until a child's fifth birthday.)

The basic identifiers (name, address, age and so on) the Council holds are held as part of data it holds anyway in its role as a Local Authority, Local Education Authority or provider of social care and are not generated uniquely for use in this processing activity.

---

You can check how long the council will keep each type of data against West Berkshire Council's retention schedule ([www.westberks.gov.uk/retention](http://www.westberks.gov.uk/retention) ).

### **How is your data stored and processed?**

Your child's data is held on the Council's database and will be protected using up-to-date technical and organisational security measures. It is transferred to the Dollywood Foundation electronically, using secure means provided by the foundation online.

## **Your rights**

You have a number of rights when it comes to the data we hold about you. These are detailed on our request form ([www.westberks.gov.uk/dprequest](http://www.westberks.gov.uk/dprequest) ) that also allows you to make a request for us to take action about something.

## **Complaints**

If you've already told us we need to do something, but we haven't responded in a way you're satisfied with, you can complain to the Information Commissioner's Office (the ICO). It's easiest to do this online via the ICO website (<https://ico.org.uk/concerns/handling/> ), but you can also do so in writing to:

The Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

END

---