
SUTTON VENY PARISH COUNCIL

Privacy Notice

Website and Online Shop

Field	Detail
Document	Privacy Notice — website and online shop
Version	2.0
Status	Adopted
Replaces	Website Privacy Statement, version 1.0, dated 20 February 2026
Prepared	22 August 2026
Adopted by the Council	3 Sep 2026
Next review due	August 2027, or earlier if the law or our processing changes
Owner	The Clerk to the Council

1. About this notice

1.1 Sutton Veny Parish Council ("we", "us", "our", "the Council") is committed to protecting your privacy and to handling your personal data lawfully, fairly and transparently. This notice explains what personal data we collect through our website, why we collect it, what we do with it, how long we keep it, and what rights you have.

1.2 This notice applies to our website at <https://suttonveny-pc.gov.uk>, including the online shop through which we sell village merchandise. It does not cover personal data we hold for other purposes — for example as an employer, as a burial authority, or in connection with planning consultations.

1.3 This notice should be read together with our Terms and Conditions of Sale, which govern purchases made through the online shop.

1.4 We handle personal data in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 as amended by the Data (Use and Access) Act 2025, and the Privacy and Electronic Communications (EC Directive) Regulations 2003 (PECR) as amended by that Act.

2. Who we are and how to contact us

2.1 Sutton Veny Parish Council is the data controller for the personal data described in this notice. Our contact details are:

Contact	Detail
Data controller	Sutton Veny Parish Council
Contact point	The Clerk to the Council
Email	clerk@suttonveny-pc.gov.uk
Postal address	5 Walnut Close, Sutton Veny, Warminster, Wiltshire, BA12 7BS
Telephone	07801 090335
Website	https://suttonveny-pc.gov.uk

Our legal status — an important clarification

2.2 A parish council in England is expressly excluded from the definition of "public authority" for the purposes of the UK GDPR by section 7(3)(a) of the Data Protection Act 2018. Two consequences follow, and the previous version of this notice stated both of them incorrectly:

- **We are not required to appoint a statutory Data Protection Officer.** The obligation in Article 37(1)(a) of the UK GDPR applies to public authorities, and for data protection purposes we are not one. Day-to-day responsibility for data protection rests with the Clerk to the Council, who is the contact point for all matters covered by this notice.

-
- **We are able to rely on legitimate interests as a lawful basis.** The restriction in Article 6(1) of the UK GDPR that prevents public authorities relying on legitimate interests when performing their tasks does not apply to us.

2.3 We are, however, a public authority for the purposes of the Freedom of Information Act 2000 and the Environmental Information Regulations 2004. Information you send us may in principle be disclosable under those regimes, although personal data is normally exempt from disclosure.

2.4 Our registration with the Information Commissioner's Office is: ZB314910 Being a parish council does not in itself exempt us from the data protection fee; the exemption depends on the purposes for which we process personal data.

3. The personal data we collect

3.1 When you contact us

If you email us, write to us, telephone us, or use a contact form on the website, we collect your name, your contact details, and whatever information you choose to put in your message.

3.2 When you buy from the online shop

To take and fulfil your order we collect:

- your name;
- your delivery address and, if different, your billing address;
- your email address;
- your telephone number, where you give one (used only if there is a problem with your order or delivery);
- details of what you have ordered, the price paid, and the date of the order;
- delivery and tracking information;
- any correspondence with you about the order, including returns, refunds and complaints.

We do not receive or store your full card details. Payments are handled by Stripe (see section 6). Stripe passes back to us only a confirmation that payment succeeded or failed, together with limited details such as the card type and the last four digits, so that we can identify the transaction and process any refund.

3.3 Information collected automatically when you visit the website

Our website and its hosting provider record limited technical information, which may include your IP address, the type of browser and device you are using, the pages you view, the date and time of your visit, and the site that referred you to us. This is used to keep the website secure and working correctly and to produce aggregate statistics about how it is used. See section 9 for how this interacts with the cookie rules.

3.4 What we do not collect

We do not knowingly collect special category data (information about health, race or ethnic origin, religious or philosophical beliefs, political opinions, trade union membership, genetic or biometric data,

sex life or sexual orientation) or criminal offence data through this website. We do not buy in personal data from data brokers or other third parties, and we do not build marketing profiles.

4. Why we use your data, and our lawful basis for doing so

Under Article 6 of the UK GDPR we must have a lawful basis for each purpose for which we use personal data. Ours are set out below.

Purpose	Data used	Lawful basis
Replying to your enquiry, request or feedback	Name, contact details, content of your message	Public task (Article 6(1)(e)) where the enquiry concerns our functions as a parish council; otherwise legitimate interests (Article 6(1)(f)) in responding to correspondence
Taking, processing and fulfilling your order	Name, addresses, email, phone, order details	Performance of a contract (Article 6(1)(b))
Taking payment and guarding against fraudulent transactions	Order details, payment confirmation, limited card identifiers	Performance of a contract (Article 6(1)(b)); legitimate interests (Article 6(1)(f)) in preventing fraud
Delivering your order or arranging collection	Name, delivery address, phone, email	Performance of a contract (Article 6(1)(b))
Handling returns, refunds, cancellations and faults	Order details, correspondence	Performance of a contract (Article 6(1)(b)); legal obligation (Article 6(1)(c)) under consumer protection law
Keeping accounting and audit records of sales	Transaction records	Legal obligation (Article 6(1)(c)) — Accounts and Audit Regulations 2015 and tax law
Handling complaints, including data protection complaints	Correspondence and related records	Legal obligation (Article 6(1)(c)); public task (Article 6(1)(e))
Keeping the website available, secure and working correctly	Technical and log data	Legitimate interests (Article 6(1)(f))
Producing aggregate statistics about how the website is used	Technical data, aggregated	Legitimate interests (Article 6(1)(f)); the storage of information on your device is dealt with in section 9
Telling existing customers about similar village merchandise, where you have not opted out	Name, email address	Legitimate interests (Article 6(1)(f)), together with the "soft opt-in" in regulation 22 of PECR — see section 12
Complying with Freedom of Information and Environmental Information requests, and with audit	Whatever is relevant to the request	Legal obligation (Article 6(1)(c))

4.1 Where we rely on legitimate interests, we have considered whether our interest is overridden by your interests, rights and freedoms, and have concluded that it is not. You may ask us for the balancing assessment behind any of these decisions, and you have the right to object (see section 10).

4.2 The Data (Use and Access) Act 2025 introduced a category of "recognised legitimate interests" for which no balancing assessment is required — for example disclosing data to a public authority carrying out a public task, or processing needed to detect crime, to safeguard a vulnerable individual, or to respond to an emergency. We will rely on that category only where one of those narrow situations actually arises.

5. Where your personal data comes from

Almost all of the personal data we hold about you is data you have given us yourself, by contacting us or by placing an order. A small amount is generated automatically when you use the website, and our payment provider confirms to us whether your payment succeeded.

6. Who we share your data with

6.1 We do not sell, rent or trade your personal data. We share it only as set out below.

Recipient	Why, and on what footing
Stripe Payments UK Ltd and its group companies	To take payment for your order and to carry out payment fraud and risk checks. Stripe acts as an independent controller for parts of this processing and publishes its own privacy policy at https://stripe.com/gb/privacy .
Royal Mail	To deliver your order. We pass only your name, delivery address and, where needed, your email or telephone number for delivery notifications.
Siteground	To host the website and the online shop. Acts as our processor under a written contract.
Independent Analytics	To produce aggregate statistics about how the website is used. Acts as our processor and does not use the data for its own purposes.
New Valley Web Design	To send order confirmations and to receive messages sent through the website. Acts as our processor.
Our internal and external auditors	To audit the Council's accounts, as required by the Accounts and Audit Regulations 2015.

6.2 Where a recipient acts as our processor, we have a written contract requiring it to keep your data secure, to use it only on our instructions, and to help us meet our obligations under the UK GDPR.

6.3 Councillors do not have routine access to online shop customer data. Access is limited to the Clerk.

7. Sending personal data outside the United Kingdom

7.1 We keep your personal data within the UK wherever we can. Some of our providers, including Stripe, are part of international groups and may process data in the United States or elsewhere.

7.2 The Data (Use and Access) Act 2025 replaced the previous "adequacy" test for international transfers with a data protection test: a transfer to another country is permitted where the standard of protection in that country is not materially lower than the standard under UK law. Where we cannot rely on that, we use appropriate safeguards — in practice the UK International Data Transfer Agreement, or the UK Addendum to the EU Standard Contractual Clauses, or the UK Extension to the EU–US Data Privacy Framework where the recipient is certified under it.

7.3 You may ask the Clerk for details of the safeguards that apply to any particular transfer.

8. How long we keep your data

We keep personal data only for as long as we need it. Our retention periods are:

Record	Retention	Reason
Online shop orders, invoices and payment records	6 years from the end of the financial year in which the transaction took place	Accounts and Audit Regulations 2015; tax records; the ordinary six-year limitation period under the Limitation Act 1980
Correspondence about an order, including returns, refunds and faults	6 years from the end of the financial year in which the matter was closed	Consumers may bring a claim about goods for up to six years (five in Scotland)
General enquiries and correspondence not relating to an order	3 years from the date the matter is closed, unless it relates to an ongoing matter of public interest or legal significance	Business need and accountability
Complaints, including data protection complaints	6 years from closure	Legal and accountability requirements
Marketing list (where you have not opted out)	Until you unsubscribe, and reviewed at least every 2 years	Data minimisation
Website server logs	12 months	Security and troubleshooting
Website usage statistics	Held in aggregate form only, from which individuals cannot be identified	No personal data is retained

At the end of the retention period we securely delete or destroy the records, unless they have been selected for permanent preservation as part of the Council's archive, in which case they may be transferred to the Wiltshire and Swindon History Centre.

9. Cookies and similar technologies

9.1 Cookies are small files placed on your device when you visit a website. Similar technologies include pixels, tags and local storage. The rules that govern them are in PECR, and they were changed by the Data (Use and Access) Act 2025 with effect from 5 February 2026. Please see our [Cookie Policy](#)

9.2 The general rule is that we need your consent before we store information on, or read information from, your device. There are now a limited number of exceptions, set out in the new Schedule A1 to PECR, where consent is not required but you must still be told clearly what we are doing and given a simple, free way to object. We use only technologies that are strictly necessary or that fall within those exceptions.

9.3 Strictly necessary — no consent needed, and these cannot be switched off

These are essential for the website and the shop to work. Without them you could not add an item to your basket or check out securely.

Purpose	What it does
Session and basket	Remembers the items in your basket as you move between pages, and keeps you connected to the right checkout session
Checkout and payment security	Allows the payment step to complete safely and helps detect fraudulent transactions
Security and load management	Protects the site against attacks and distributes traffic across servers
Cookie preference record	Remembers any objection you have registered, so we do not have to ask you again

9.4 Website statistics — no consent needed, but you may object

We use Independent Analytics to understand how many people visit the site and which pages are useful, so that we can improve it. This falls within the statistical exception in Schedule A1 to PECR. The conditions that make that exception available are met, and we confirm that:

- the information is used solely to produce aggregate statistics about how the site is used, and to make improvements to it;
- we do not use it to track you as an individual, to build a profile of you, or to target advertising at you;
- the information is not shared with anyone else, except with our analytics provider for the sole purpose of helping us improve the website;
- this notice is the clear and comprehensive information about that purpose that the law requires us to give you; and
- if you use a static IP address, you can object at any time, free of charge by emailing the Clerk and we stop collecting statistics from your visits.

9.5 Appearance and functionality — no consent needed, but you may object

We may store a small amount of information to remember your preferences, such as text size or whether you have dismissed a notice, so that the site behaves the way you left it. This falls within the appearance and functionality exception in Schedule A1, and the same right to object applies.

9.6 Anything else needs your consent

We do not use advertising cookies, social media tracking pixels, or any technology that follows you across other websites. If that ever changes we will ask for your consent first, through a banner that makes accepting and rejecting equally easy, and we will update this notice before doing so.

9.7 Controlling cookies yourself

You can also block or delete cookies through your browser settings. Please note that browser settings are not a substitute for the objection mechanism described above, and that blocking strictly necessary cookies will stop the shop working. Guidance on browser settings is available at www.aboutcookies.org.

10. Your rights

10.1 You have the following rights over your personal data. Some of them apply only in particular circumstances, and we will explain if a right does not apply to your situation.

Right	What it means
Access	To be told whether we hold personal data about you and, if so, to receive a copy of it together with information about how we use it. This is often called a subject access request.
Rectification	To have inaccurate personal data corrected, and incomplete data completed.
Erasure	To have your personal data deleted, where we no longer need it, where you withdraw consent we were relying on, or where we have processed it unlawfully. This right does not apply where we must keep the record — for example accounting records of a sale.
Restriction	To ask us to stop using your data while a dispute about its accuracy or our use of it is resolved.
Portability	Where we process your data by automated means on the basis of consent or a contract, to receive it in a structured, commonly used, machine-readable format, or to have it sent to another controller.
Objection	To object to processing based on our legitimate interests or on our public task, and to object at any time to direct marketing. An objection to direct marketing is absolute — we will always stop.
Withdrawal of consent	Where we rely on your consent, to withdraw it at any time. This does not affect anything we did lawfully before you withdrew it.
Rights about automated decisions	See section 11.

How to exercise your rights, and what happens next

10.2 Contact the Clerk using the details in section 2. You do not have to use a particular form of words, and there is no charge, unless a request is manifestly unfounded or excessive, in which case we may charge a reasonable fee or refuse it — and we will explain why.

10.3 We may need to confirm your identity before we act, particularly for a request for a copy of your data. The one-month period for our response runs from the latest of: the day we receive your request, the day we receive any identification we have reasonably asked for, and the day we receive any fee that is properly payable.

10.4 If your request is broad and we genuinely need to know what you are looking for, we may ask you to clarify it. Where we do, the clock stops until you reply. This "stop the clock" provision was introduced by the Data (Use and Access) Act 2025.

10.5 We may extend the one-month period by up to two further months where a request is complex or where you have made a number of requests. If we do, we will tell you within the first month and explain why.

10.6 In responding to a request for a copy of your data, we are required to carry out a reasonable and proportionate search — not an exhaustive one. If we do not provide something you expected, ask us and we will explain the scope of the search we carried out.

11. Automated decision-making and profiling

11.1 We do not make decisions about you by wholly automated means that produce legal effects or otherwise significantly affect you.

11.2 Stripe applies automated fraud and risk checks to card payments, and a payment may be declined as a result. If your payment is declined and you believe that is wrong, contact the Clerk and a person will look at it and, where appropriate, arrange another way for you to pay. The safeguards in Articles 22A to 22D of the UK GDPR, as introduced by the Data (Use and Access) Act 2025, apply: you are entitled to meaningful information about the decision, to human review, and to contest it.

12. Marketing

12.1 We do not send marketing to people who have simply visited the website or contacted us with an enquiry.

12.2 If you buy something from us, we may email you occasionally about similar village merchandise. We are permitted to do this under the "soft opt-in" in regulation 22 of PECR because we obtained your details in the course of a sale, we are only telling you about our own similar products, and we give you the chance to refuse both when you order and in every message we send. Every email contains a one-click unsubscribe link, and you can also ask the Clerk to remove you at any time.

12.3 We will never pass your details to anyone else for their own marketing.

13. Children

13.1 The online shop is intended for adults. You must be 18 or over to place an order, as set out in our Terms and Conditions of Sale.

13.2 The website as a whole is a village information site that children may use. The Data (Use and Access) Act 2025 requires us to take children's needs into account when we design online services and decide how personal data will be used. We have done so: the site collects no more information than it needs, uses no tracking or advertising technology, and does not profile visitors of any age.

14. Keeping your data secure

14.1 We take appropriate technical and organisational measures to protect personal data against unauthorised access, loss, destruction or alteration. These include serving the whole website over an encrypted connection (HTTPS), taking card payments only through Stripe's hosted, PCI-DSS-compliant checkout so that card details never reach our systems, restricting access to order data to those who need it, using strong and unique passwords with multi-factor authentication where it is available, keeping the website and its software up to date, and taking regular backups.

14.2 If a personal data breach occurs that is likely to result in a risk to your rights and freedoms, we will report it to the Information Commissioner's Office within 72 hours of becoming aware of it, and we will tell you directly where the risk is high.

14.3 No transmission of information over the internet can be guaranteed to be completely secure. While we protect your data to the standards described above, sending information to us over the internet is at your own risk.

15. Links to other websites

Our website links to other sites, including Wiltshire Council, village organisations and our payment provider. This notice applies only to our own site. We are not responsible for the privacy practices of other operators, and we suggest you read their privacy notices before giving them personal information.

16. How to complain

16.1 If you are unhappy with how we have handled your personal data, please tell the Clerk first. You can complain by email, by letter, or by using the form at <https://suttonveny-pc.gov.uk/data-complaint-form/>. You do not need to use any particular wording.

16.2 Since 19 June 2026, section 164A of the Data Protection Act 2018 has required us to make it easy to complain to us, to acknowledge a data protection complaint within 30 days of receiving it, and to take appropriate steps to respond without undue delay. We will keep you informed of progress and of the outcome.

16.3 You also have the right to complain to the Information Commissioner's Office at any time, and you do not have to come to us first. The ICO can be contacted at www.ico.org.uk/make-a-complaint, on 0303 123 1113, or at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF. The ICO is in the process of being reconstituted as the Information Commission under the Data (Use and Access) Act 2025; its contact details and its role as the UK data protection regulator are unaffected, and we will update the name here once the change takes effect.

17. Changes to this notice

We review this notice at least once a year, and whenever our processing or the law changes. The current version is always published at <https://suttonveny-pc.gov.uk/privacy>. Where a change is significant we will draw attention to it on the website and, if it affects an active order, tell customers directly.

18. Version history

Version	Date	Summary of changes
1.0	20 February 2026	Original Website Privacy Statement.
2.0	3 September 2026	Rewritten. Corrected the statements about the Council's status as a public authority, its Data Protection Officer obligations and its ICO registration. Added all processing carried out by the online shop, including payment, delivery and retention. Rewrote the cookie section for PECR as amended by the Data (Use and Access) Act 2025. Added the statutory complaints procedure required by section 164A of the Data Protection Act 2018. Updated the subject access provisions, the international transfer test and the automated decision-making safeguards. Corrected the website address throughout.