

# Harborough District Council – Privacy Notice: Payment Processing (Windcave)

Last updated: 03/09/2025

This privacy notice explains how Harborough District Council (“the Council”) uses your personal data when you make a payment using our payment processing services provided by Windcave Limited.

## Who we are

Harborough District Council is the Data Controller for the personal data you provide when making payments to us.

- Address: The Symington Building, Adam and Eve Street, Market Harborough, LE16 7AG
- Email: [FOI@harborough.gov.uk](mailto:FOI@harborough.gov.uk)
- Telephone: 01858 828282

Windcave Limited acts as a Data Processor on our behalf when it processes your payment transaction data. For some activities (such as its own regulatory obligations) Windcave acts as an independent Data Controller.

## What information we collect

When you make a payment, we will process the following information:

- Your name and contact details (address, email, telephone number)
- Payment card details (cardholder name, card number, expiry date, cardholder billing address, issuing country)
- Transaction details (amount, date, reference number)
- Online identifiers such as IP address and cookies (when using online payment services)

We do **not** collect or process special category (sensitive) data about you for payment purposes.

## Why we collect this information (purposes)

We use your information in order to:

- Process and administer payments you make to the Council
- Issue refunds where appropriate
- Comply with legal and financial obligations (e.g. audit, anti-fraud, anti-money laundering checks)

- Maintain records of transactions for financial reporting and accountability

## Lawful basis for processing

We process your personal data under the following lawful bases (UK GDPR, Article 6):

- **Article 6(1)(c)** – processing is necessary for compliance with a legal obligation (e.g. financial regulations, audit)
- **Article 6(1)(e)** – processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Council
- **Article 6(1)(b)** – processing is necessary for the performance of a contract (to administer your payment)

## Who we share your information with

Your data will be shared with:

- **Windcave Limited**, our contracted payment processor
- Our acquiring bank and relevant card payment schemes (e.g. Visa, Mastercard)
- Regulatory bodies and auditors where legally required
- Other third parties only where required by law (e.g. law enforcement, fraud prevention bodies)

We do not sell your personal data to third parties.

## International transfers

Windcave may transfer your personal data to related companies and sub-processors located outside the UK, including in New Zealand, Australia, Canada, Singapore and the United States. Where this occurs, Windcave is required to ensure that appropriate safeguards are in place in accordance with UK GDPR (such as the UK's International Data Transfer Agreement or adequacy regulations) where this is required.

## How long we keep your information

We will retain your personal data only for as long as necessary to:

- Process the payment
- Meet audit, financial reporting and legal obligations
- Deal with any disputes, chargebacks, or refunds

Typically, payment transaction data is kept for **up to 7 years (6+1)** in line with our financial records retention schedule. After this period it will be securely deleted or anonymised.

## Your rights

Under data protection law, you have the following rights:

- To be informed about how we process your data (this notice)
- To access a copy of your personal data (Subject Access Request)
- To have inaccurate data corrected
- To request erasure of your data (where applicable)
- To restrict or object to processing (in limited circumstances)
- To request data portability (where applicable)

Some rights may not apply where data is processed for statutory or legal obligations.

## How we protect your data

Windcave complies with industry standards (including PCI DSS) and uses encryption and other security measures to protect payment information. The Council also applies appropriate technical and organisational measures to safeguard your data.

## Complaints

If you are unhappy with how your data has been handled you can contact the Council's Data Protection Officer:

- Email: [FOI@harborough.gov.uk](mailto:FOI@harborough.gov.uk)
- Address: Harborough District Council, The Symington Building, Adam and Eve Street, Market Harborough, LE16 7AG

*You also have the right to complain to the Information Commissioner's Office (ICO):*

- Website: [www.ico.org.uk](http://www.ico.org.uk)
- Telephone: 0303 123 1113