



Privacy Notice and Data Protection Policy



PRIVACY NOTICE AND DATA PROTECTION POLICY

Data Controller: The Parochial Church Council of the Ecclesiastical Parish of Claygate; Charity Number 1128476, known as Holy Trinity Claygate (HTC)

Data Protection Lead: Mark Chapman, Operations Manager.

Date of Policy: 21 July 2021

This is the Privacy Notice and Data Protection Policy for Holy Trinity Claygate. It covers how we will process (use and store) your data, what data we hold, your individual rights and how you can interact with us about your data. As with all policy statements, it is a bit wordy! But don't let this put you off, and if you need to, you are welcome to get in touch with our Data Protection Lead. We are here to help!

This policy covers our use of **personal data**, which is any information about a living individual which allows them to be identified from that data (for example a name, photographs, videos, email address, or address). Identification can be by the information alone or in conjunction with any other information.

Our **processing of personal data** is governed by the Data Protection Bill/Act 2017-2019 and the General Data Protection Regulation 2016/679 (the "GDPR" and other legislation relating to personal data and rights such as the Human Rights Act 1998].

WHO ARE WE?

This Privacy Notice is provided to you by The Parochial Church Council of the Ecclesiastical Parish of Claygate which is the **Data Controller** for your data. Holy Trinity Claygate has appointed a number of responsible people for the control and processing of personal data that we hold. These post-holders have been trained in GDPR requirements and a list of the individuals can be inspected at the Church Office by request. For clarity, the term Data Controller covers, and is accountable for, all employed staff members, office holders and trustees for Holy Trinity Claygate.

SO, HOW IS YOUR DATA USED AND PROCESSED?

Holy Trinity Claygate processes data containing:

- names, titles, and aliases, photographs.
- contact information including telephone numbers, postal /residential addresses, and email addresses.
- data required to undertake a DBS check.
- where there is a legitimate interest to facilitate our charitable aims and activities, or where you have provided them to us, we may process demographic information such as gender, age, date of birth, marital status, nationality, education/work histories, academic/professional qualifications, hobbies, family composition, and dependants.
- children's attendance data at Sunday groups, any specific medical information and/or additional needs together with names of any adults not authorised to collect the child.
- where you give financially in support of Holy Trinity Claygate or pay for church activities (event bookings etc.), financial identifiers such as bank account numbers, payment card numbers, payment/transaction identifiers, policy numbers, and claim numbers.
- as a church, there will be some instances where the data that you provide and we hold may constitute sensitive personal data. Where you chose to provide us with any other personal information it will only be used in support of the intended purposes stated at the time at which it was collected, and subject to any preferences indicated by you.

As a Data Controller, all our appointed persons will comply with their legal obligations to keep personal data up to date; to store and destroy it securely; to not collect or retain excessive amounts of data; to keep personal data secure, and to protect personal data from loss, misuse, unauthorised access and disclosure and to ensure that appropriate technical measures are in place to protect personal data. If you have any concerns about how your data is being used, please speak with our Data Protection Lead.



WHAT ARE WE DOING WITH YOUR DATA?

We only hold data that either we are legally obliged to or that helps us fulfil our missional and charitable aims as a church. We are a membership organisation and good communication with our membership is an essential part of being church.

Therefore, we will hold and process data to:

- enable us to meet all legal and statutory obligations which include maintaining and publishing our electoral roll in accordance with the Church Representation Rules;
- comply with and facilitate our comprehensive safeguarding procedures (including due diligence and complaints handling) in accordance with best safeguarding practice with the aim of ensuring that all children and vulnerable adults are provided with safe environments (please see our safeguarding procedure).
- help you grow as a disciple and to minister to you and provide you with pastoral and spiritual care (such as visiting you when you are gravely ill or bereaved) and to organise and perform ecclesiastical services for you, such as baptisms, confirmations, weddings and funerals.
- deliver our church's mission to our community, and to carry out any other voluntary or charitable activities for the benefit of the public as provided for in the constitution and statutory framework of our charitable organisation.
- administer our membership records of adult and child members.
- enable us to follow up membership, course and event enquiries
- fundraise and promote the interests of the Church and charity.
- maintain our own accounts and records.
- process and record financial donations that you have made (including Gift Aid information).
- communicate with you about your views or comments.
- update you about changes to our services, events, role holders and any matters of interest related to you church community.
- send you communications which you have requested and that may be of interest to you. These may include information about campaigns, appeals, other fundraising activities.
- process a grant or application for a role.
- enable us to provide a voluntary service for the benefit of the public in a particular geographical area.
- inform decisions around church school applications (attendance data).
- to help with planning (attendance data).

WHAT IS OUR LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA?

- most of our data is processed because it is necessary for our legitimate interests to enable our charitable and missional aims. For example, maintaining membership records, safeguarding our children, recording our financial donations and operating team rotas for the effective function of Sunday services.
- some of our processing is necessary for compliance with a legal obligation e.g. retaining safeguarding records and gift aid declarations.
- we are required by the Church Representation Rules to administer and publish the Electoral Roll, and under Canon Law to announce forthcoming weddings by means of the publication of Banns.
- we may also process data if it is necessary for the performance of a contract with you, or to provide a direct service to you. For example, if you buy tickets for a church event.
- as a religious organisation, we are permitted to process information about your religious beliefs to administer membership or contact details.
- where your information is used other than in accordance with one of these legal bases, we will first obtain your consent to that use.



WILL WE SHARE YOUR DATA?

We will always treat your personal data as strictly confidential. It will only be shared with third parties where it is necessary for us as a church or where you first give us your prior consent. For example, we utilise external providers to maintain our database software, to run our payroll and to support our financial systems. All of these bodies will be part of our church setup and have their own privacy policies and will have confirmed to us that they are GDPR compliant. On occasion, there may be a reason to share personal data with other churches with which we are carrying out joint events or activities.

HOW LONG WILL WE KEEP YOUR PERSONAL DATA?

Our general rule is to keep data no longer than necessary. Where you continue to actively engage with our church services, activities and events, we will retain the appropriate membership data for you so that we can best serve your involvement. We operate to an annual process of review, by which we assess who is actively engaging in church membership, and where this is not the case we will remove your data. Additionally:

- we will keep some records permanently if we are legally required to do so. For example this covers service, wedding, baptism registers and some safeguarding records.
- we may keep some other records for an extended period of time. For example, it is current best practice to keep financial records for a minimum period of 7 years to support HMRC audits.

WHAT ARE YOUR RIGHTS IN REGARDS TO YOUR PERSONAL DATA?

You have the following rights with respect to your personal data: when exercising any of the rights listed below, in order to process your request, we may need to verify your identity for your security. In such cases we will need you to respond with proof of your identity before you can exercise these rights.

- **the right to access information we hold on you.** At any point you can contact us to request the information we hold on you as well as why we have that information, who has access to the information and where we obtained the information from. Once we have received your request we will respond within one month. There are no fees or charges for the first request but additional requests for the same data may be subject to an administrative fee.
- **the right to correct and update the information we hold on you.** If the data we hold on you is out of date, incomplete or incorrect, you can inform us and your data will be updated. You also have access as a church member to be able to update aspects of your personal data directly via our members portal.
- **the right to have your information erased.** If you feel that we should no longer be using your data or that we are illegally using your data, you can request that we erase the data we hold. When we receive your request we will confirm whether the data has been deleted or the reason why it cannot be deleted (for example because we need it for our legitimate interests or regulatory purpose(s)).
- **the right to object to processing of your data.** You have the right to request that we stop processing your data. Upon receiving the request we will contact you and let you know if we are able to comply or if we have legitimate grounds to continue to process your data. Even after you exercise your right to object, we may continue to hold your data to comply with your other rights or to bring or defend legal claims.
- **the right to data portability.** You have the right to request that we transfer some of your data to another controller. We will comply with your request, where it is feasible to do so, within one month of receiving your request.
- **the right to withdraw your consent to the processing at any time for any processing of data to which consent was sought.** You can withdraw your consent easily by telephone, email, or by post (see Contact Details below).
- **the right to lodge a complaint with the Information Commissioner's Office.** You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.



TRANSFER OF DATA ABROAD

Our website is accessible from overseas so on occasion some personal data (for example in a newsletter) may be accessed from overseas, however it is our general practice not to publish any personal data on our website or in our printed news sheets.

Any electronic personal data transferred to countries or territories outside the EU will only be placed on systems complying with measures giving equivalent protection of personal rights either through international agreements or contracts approved by the European Union.

FURTHER PROCESSING

If we wish to use your personal data for a new purpose, not covered by this notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

YOU ARE VERY WELCOME TO GET IN CONTACT WITH US

If you have any queries or concerns about how we use your data, please do get in contact with us.

Our Data Protection lead is Mark Chapman and can be contacted at Holy Trinity Claygate, Church Road, Claygate, Surrey, KT10 0JP, by email at markchapman@htclaygate.org or by telephone at 01372 662004.