

## General Data Protection Regulation - Policy.

The General Data Protection Regulation ("GDPR") is a new, European-wide law that replaces the Data Protection Act 1998 and comes into force on 25 May 2018.

Information is being used in ways which were never anticipated by previous data protection laws and so the GDPR places greater obligations on how organisations handle personal data and churches are not exempt from it.

Morally and legally we have a duty to look after all personal data and this policy sets out how we are going to comply with GDPR.

To that end, the PCC of Holy Trinity Rothwell ("Rothwell") has created the below data privacy policy and voted to accept it effective 25 June 2018.

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### DATA PRIVACY NOTICE

#### The Parochial Church Council (PCC) of Holy Trinity Church Rothwell

##### 1. Your personal data - what is it?

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession. The processing of personal data is governed by the General Data Protection Regulation (the "GDPR").

##### 2. Who are we?

The PCC of Holy Trinity Rothwell is the data controller (contact details below). This means it decides how your personal data is processed and for what purposes.

##### 3. How do we process your personal data?

The PCC of Holy Trinity Rothwell complies with its obligations under the GDPR by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

We use your personal data for the following purposes:

- Safe - what is in the safe? Cheques, certificates, registers and other important documents.
- Registers - which registers and where are they kept, who has access to them?
  - Reports - what reports? Hard copies and electronic versions.

- Newsletter - names of individuals/couples we are praying for. Personal data at the end (contact details) people consent by putting things in the newsletter consent to be contacted about what they have written.
- Website - contact details, photographs.
- Social Media - contact details, events, permissions for editing.
- Weddings - forms etc.
- Baptisms - forms etc.
- Funerals - please advise.
- Services
- Fundraising - gift aid, stewardship. Not regular giving unless otherwise advised.
- Emails - distribution lists.
- Bookings - who is involved, what does the form look like? What questions are asked.
- Property/Fabric - agents and tenants.
- Employees - updated contracts.
- Clergy
- [To enable us to provide a voluntary service for the benefit of the public in a particular geographical area as specified in our constitution; ● To administer membership records;
- To fundraise and promote the interests of the charity;
- To manage our employees and volunteers;
- To maintain our own accounts and records (including the processing of gift aid applications);
- To inform you of news, events, activities and services running at Holy Trinity Rothwell;
- To share your contact details with the Diocesan office so they can keep you informed about news in the diocese and events, activities and services that will be occurring in the diocese and in which you may be interested.

More specifically, The PCC of Holy Trinity Rothwell completed a data audit on [INSERT DATE] which, to the best of our knowledge, identifies all the ways we process your information. We see this audit as a living document and to that end, The PCC of Holy Trinity Rothwell is committed to updating it and making it available in church (and to you if you request it) on an annual basis in the month prior to the Annual General Meeting of The PCC of Holy Trinity Rothwell.

#### 4. What is the legal basis for processing your personal data?

- Explicit consent of the data subject so that we can keep you informed about news, events, activities and services and process your gift aid donations and keep you informed about diocesan events.
- Processing is necessary for carrying out obligations under employment, social security or social protection law, or a collective agreement;
- Processing is carried out by a not-for-profit body with a political, philosophical, religious or trade union aim provided: o the processing relates only to members or

former members (or those who have regular contact with it in connection with those purposes); and

- there is no disclosure to a third party without consent.

## 5. Sharing your personal data

Your personal data will be treated as strictly confidential and will only be shared with other members of the church or member of the clergy licenced to officiate at Holy Trinity Rothwell in order to carry out a service to other church members, for purposes connected with the church or in the ways identified in the Data Audit or in section 3 above.

We will only share your data with third parties outside of the parish with your consent.

For example, if you are planning to have your wedding at Holy Trinity Rothwell and you would like someone to do your flower arrangements for you and we know of a suitable company, we will not give your information to any such company offering this service. Instead, we will take their details and pass them on to you for you to consider or contact you and obtain your consent that you are happy for us to pass your details onto them.

## 6. How long do we keep your personal data <sup>1</sup>?

We keep data in accordance with the guidance set out in the guide "Keep or Bin: Care of Your Parish Records" which is available from the Church of England website [see footnote for link].

Specifically, we retain electoral roll data while it is still current; that is to say on an annual basis. We also keep details of gift aid declarations and associated paperwork for up to 6 years after the calendar year to which they relate. The parish registers (baptisms, marriages, funerals) are kept permanently. Please note that whilst no personal information is contained in any of the following reports, this information is used to submit our annual reports to the Diocese. Our annual reports include statistics, committee reports and annual accounts.

## 7. Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of your personal data which the PCC of Holy Trinity Church Rothwell holds about you;
- The right to request that the PCC of Holy Trinity Church Rothwell corrects any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary for the PCC of Holy Trinity Church Rothwell to retain such data;
- The right to withdraw your consent to the processing at any time

- The right to request that the data controller provide the data subject with his/her personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable) [Only applies where the processing is based on consent or is necessary for the performance of a contract with the data subject and in either case the data controller processes the data by automated means].
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable) [Only applies where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics]
- The right to lodge a complaint with the Information Commissioners Office.

## 8. Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Protection Notice, then we will contact you and 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.

At this time, the PCC of Holy Trinity Church Rothwell does not participate in direct marketing. We do however have a website which we try to update as often as we can and we have a localised presence on social media. We also have a weekly newsletter which is sent via email to all those who wish to receive an electronic copy of it and a seasonal magazine which is hand delivered throughout the local area. We are confident that our methods of outreach and our publications do not use personal data in a way that has not been consented to. However, we are committed to safeguarding your personal data and maintaining your privacy and therefore we will continue to monitor how we process your personal data.

## 9. Contact Details

The Data Protection Officer at Holy Trinity Rothwell is [INSERT NAME].

The Incumbent at Holy Trinity Rothwell is [INSERT NAME]. They are a separate legal entity to the PCC and therefore they are a separate data processor.

To exercise all relevant rights, queries of complaints please in the first instance contact the PCC Secretary / Parish Administrator at [insert contact details].

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.

Finally, we have set out some of our own 'best practices' below.

1. Lock the safe;
2. Lock the buildings when not in use;
3. Lock the office door when not in use;
4. Keep a register of keyholders;
5. Keep filing cupboards and drawers locked;
6. Confidential information to be kept locked away securely
7. Destroy confidential information/documents once they are no longer needed;
8. Lock PC/Computer screens when you are not using them and log off;
9. Be mindful of where you are having conversations and make sure they are not confidential.
10. Church officers to have a dedicated email address.

