

DATA PROTECTION NOTICE

Minehead Parochial Church Council - St Michael's, St Andrew's, St Peter's

Joint Data Controllers: Minehead Parochial Church Council (Minehead PCC) and the Incumbent

Data Protection Lead: Tracey Staples

Reviewed: June 2020

This is the privacy statement and data protection policy for the Parish of Minehead and the present Incumbent of the Parish. 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). This may be you! Identification can be by the information alone or in conjunction with any other information.

Our **processing of personal data** is governed by the General Data Protection Regulation (the "GDPR").

Who are we? This Privacy Notice is provided to you by Minehead PCC and the Incumbent being the **Joint Data Controllers** for your data. Minehead PCC and the Incumbent have appointed a responsible person for the control and processing of personal data that we hold. This post-holder has been trained in GDPR requirements... For clarity, the term Data Controller covers all employed staff members, office holders and trustees for the Parish of Minehead.

So, how is your data used and processed?

Minehead PCC and the Incumbent process data containing:

- Names, titles, and aliases, photographs;
- Contact information including telephone numbers, postal /residential addresses, and email addresses;
- 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;
- Where you give financially in support of Minehead PCC, St Michael's, St Andrew's or St Peter's 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 (religious organisation), the data we process is likely to constitute sensitive personal data because the very fact that we process your data at all may be suggestive of your religious beliefs. Where and if you provide this information, we may also process other categories of sensitive personal data: racial or ethnic origin, mental and physical health, details of injuries, medication/treatment received, and criminal records, fines and other similar judicial records.
- 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: Tracey Staples.

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 from time to time with the aim of ensuring that all children and adults-at-risk are provided with safe environments (please see our safeguarding procedure);
- To minister to you and provide you with pastoral and spiritual care (such as visiting you when you are 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;
- Manage our employees and volunteers;
- 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 in the 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 as specified in our constitution;
- Share your contact details with the benefice administrator so they can keep you informed about news, events, activities and services that will be occurring in the benefice;
- Share your contact details with the diocesan office so they can keep you informed about news, events, activities and services that will be occurring in the diocese and which are relevant to the role you are undertaking.

Our processing also includes the use of CCTV systems for the prevention and prosecution of crime.

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 church services.
- As a religious organisation, we are permitted to process information about your religious beliefs to administer membership or contact details. Processing is carried out by a not-for-profit body with a political, philosophical, religious or trade union aim provided: -
 - 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.
- Explicit consent of the data subject so that we can keep you informed about news, events, activities and services and keep you informed about benefice and diocesan events.
- Some of our processing is necessary for carrying out legal obligations in relation to Gift Aid or under employment, social security or social protection law, or a collective agreement. Retaining safeguarding records and gift aid declarations are examples of this. Also, 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.
- 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?

You can be reassured that we will treat your personal data as strictly confidential. It will only be shared with third parties where it is necessary for the performance of our tasks or where you first give us your prior consent. It is likely that we will need to share your data with some or all of the following (but only where necessary):

- Appropriate bodies within our denominational / synodical structure. All of these bodies will be part of our church setup and have their own privacy policies.
- Our agents, servants and contractors where necessary. For example, the magazine editor.
- On occasion, 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. 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. Details about retention periods can currently be found in the Record Management Guides located on the Church of England website at: - <https://www.churchofengland.org/more/libraries-and-archives/records-management-guides>

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, funeral/burial 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;
- We retain electoral roll data while it is still current.

What are your rights in regards to your personal data?

Unless subject to an exemption under the GDPR, 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.
- **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.
- **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 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 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 social media sites, our web pages on A Church Near You and our Parish Team Up calendar are 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 publications unless consent has been gained for example Parish Prayer List.

Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Protection 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 Tracey Staples and can be contacted at:

Address: The Parish Office, St Andrew's Church, Wellington Square, Minehead, TA24 5NH

Email: mineheadparish@gmail.com

Tel: 01643 818904 (Monday mornings and Wednesday afternoons.)