

# DATA PRIVACY NOTICE

## The Parochial Church Council (PCC) of St Paul's, Dorking

### 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") and the Data Protection Act 2018.

### 2. Who are we?

The PCC of St Paul's, Dorking is the "data controller" (contact details below). This means it decides how your personal data is processed and for what purposes. In general, all employees, office holders and other volunteer workers of the Church act for the PCC in this respect. Exceptionally, however, the Incumbent may sometimes act as a separate data controller, determining the manner and/or purposes of data processing independently.

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

The personal data processed by us (the PCC) primarily comprises names, contact information and sometimes photographs. However, we may also process other personal data where necessary for our purposes, including financial identifiers and certain demographic information such as sex, date of birth, family relationships and work or school details. For some pastoral situations, we may process personal data that is considered 'sensitive', e.g. relating to health, sexual orientation or ethnicity.

We comply with our obligations under the "GDPR" by keeping personal data secure, storing and destroying it securely and ensuring that appropriate technical measures are in place to protect it from loss, misuse, unauthorised access and disclosure. We do not collect or retain excessive amounts of data; and strive to keep the data up to date.

We use your personal data for the following purposes: -

- To meet relevant legal, statutory or contractual obligations;
- To enable us to fulfil the ministry and mission of the Church, providing a voluntary service for the benefit of the public in a particular geographical area as specified in our constitution;
- To organise and perform ecclesiastical services for you, such as baptisms, confirmations, weddings and funerals;
- To promote the interests of the Church and raise money for its ministry and mission;
- To administer membership records of adult and child members;
- To ensure the safety of children and adults-at-risk;
- 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 St Paul's;
- To provide you with other information which we think will interest you.

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

- Some of our processing is necessary to comply with legal obligations. Examples include the church electoral roll, marriage registers, Gift Aid declarations and safeguarding records.
- Some of our processing is necessary to fulfil contractual obligations. Examples include employee-related matters, lettings arrangements and the paying of bills.
- Most of our processing, while not being legally or contractually necessary, is necessary for our legitimate interests (enabling our charitable and missional aims). Examples include maintaining membership records, operating team rotas in connection with services and other activities, and seeking and recording financial donations from electoral roll members.
- Some of our data processing is carried out solely on the basis that the individual concerned has given their explicit consent. Examples include being part of a website “Address Book” available to other members and being sent information about wider events (not directly or very closely related to St Paul’s itself).
- Under “GDPR”, the processing of specified categories of ‘sensitive’ data is subject to additional rules and normally requires the data subject to have given explicit consent. However, as a “not-for-profit body with a political, philosophical, religious or trade union aim”, we may lawfully process such data (including data about your religious beliefs) as long as you are a member or former member (or in regular contact with St Paul’s) and we do not disclose this data to anyone else without your 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 in order to carry out a service to other church members or for purposes connected with the church (or if you specifically consent to wider availability in the website “Address Book”). We will only share your data with third parties where this is necessary for the performance of our tasks or where you have given us consent.

Occasionally, it may be necessary to share your data with another body in the Church of England (e.g. the Diocese of Guildford), or another church with whom we are carrying out a joint event or activity.

#### **6. How long do we keep your personal data?**

Our general rule is to keep data no longer than necessary, guided by the document “Keep or Bin: Care of Your Parish Records” which is available from the Church of England’s website.

Specifically, we retain electoral roll data while it is still current, Gift Aid declarations and associated paperwork for six years after the year to which they relate, and parish registers (baptisms, marriages, funerals) permanently.

#### **7. Your rights and your personal data**

Other than in those circumstances where the “GDPR” provides exemptions, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data that we hold about you;
- The right to request us to correct 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 us to retain such data;
- 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 that processing constitutes 'direct marketing' or if you can reasonably argue that our reliance on the "legitimate interests" legal basis (see section 4 above) is not appropriate;
- The right, where the lawful basis for processing is your consent, for you to withdraw that consent at any time;
- The right (in certain, very limited situations) to request us to transfer your personal data to another data controller;
- The right to lodge a complaint with the Information Commissioner's Office.

### **8. Further processing**

If we wish to use your personal data for a new purpose, not covered by this Data Privacy 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.

### **9. Contact Details**

To exercise all relevant rights, queries or complaints please in the first instance contact the Parish Administrator on 01306 743378 or by e-mail at [reception@stpaulsdorking.org.uk](mailto:reception@stpaulsdorking.org.uk).

You can contact the Information Commissioner's Office on 0303 123 1113, via email at <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office: Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.

**Date of this notice: 24 May 2018**