

## The Parochial Church Council (PCC) of St Peter's Dumbleton

### DATA PRIVACY NOTICE

#### 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 St Peter's Dumbleton is the data controller. (Contact details are in section 12). This means that the PCC decides how your personal data is processed and for what purposes. The main role of the PCC is to co-operate with the minister in promoting, in the parish, the whole mission of the Church, pastoral, evangelistic, social and ecumenical. It also has maintenance responsibilities for St Peter's Church.

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

The PCC of St Peter's Dumbleton 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 some or all of the following purposes:

- 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);
- To carry out 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;
- To comply with health and safety requirements;
- 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;
- To enable us to provide a church body voluntary service for the benefit of the public in a particular geographical area;
- To administer membership records;
- To manage our volunteers;
- To fundraise and promote the interests of the charity;

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- To maintain our own accounts and records (including the processing of Gift Aid applications);
- To process a donation that you have made (including Gift Aid information);
- To inform you of news, events, activities and services running at St Peter's or more widely within the diocese;
- To operate our parish web sites;
- To seek your views or comments;
- To notify you of changes to our services, events and role holders;
- To send you communications which you have requested and that may be of interest to you. These may include information about campaigns, appeals and other fundraising activities;
- To process a grant or application for a role;
- To check attendance compliance for those establishing a qualifying connection for marriage;
- To provide facilities for hire;
- To care for and improve the church building, contents and grounds.

We will process some or all of the following where necessary to perform our tasks:

- Names, titles, aliases, and photographs;
- Contact details such as telephone numbers, addresses, and email addresses;
- Where they are relevant to our mission, or where you provide them to us, we may process demographic information such as gender, age, date of birth, marital status, marriage qualification status, nationality, education/work histories, academic/professional qualifications, hobbies, family composition, and dependants;
- Where you make donations or pay for activities such as use of the church, financial identifiers such as bank account numbers, payment card numbers, or payment/transaction identifiers.

The data we process is likely to constitute ***special category (sensitive) personal data*** because, as a church, the fact that we process your data at all may be suggestive of your religious beliefs. When provided, we may also process other categories of sensitive personal data concerning racial or ethnic origin, and where relevant, mental and physical health, details of injuries, medication/treatment received, and criminal records, fines and other similar judicial records.

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

Most of our data is processed because it is necessary for our ***legitimate interests***, or the legitimate interests of a third party (such as another organisation in the Church of England). An example of this would be our safeguarding work to protect children and adults at risk. We will always take into account your interests, rights and freedoms.

Some of our processing is necessary for compliance with a ***legal obligation***. For example, 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. Processing is also necessary for carrying out legal obligations in

relation to Gift Aid or under employment, social security or social protection law, and to meet HMRC<sup>1</sup> and other statutory requirements.

We may also process data if it is necessary for the performance of a **contract** with you, or to take steps to enter into a contract. An example of this would be processing your data in connection with the hire of church facilities.

Where your information is used other than in accordance with one of these legal bases, we will first obtain your **consent**<sup>2</sup> to that use. We will seek explicit consent to keep you informed about news, events, activities and services in both the parish and the wider diocese.

When we process **special category (sensitive) personal data**, it will be done subject to one or more of the following conditions:

- Explicit consent of the data subject;
- 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 religious 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;
- Processing relates to personal data manifestly made public by the data subject;
- Processing is necessary for archiving purposes in the public interest, or scientific and historical research purposes or statistical purposes.

Religious organisations are permitted to process information about your religious beliefs to administer membership or contact details.

## 5. Sharing your personal data

Your personal data will be treated 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 your prior consent, or in respect of a legal/statutory obligation. It is likely that we will need to share your data with some or all of the following (but only where necessary):

- The appropriate bodies of the Church of England including the other data controllers;
- Other clergy or lay persons nominated or licensed by the bishops of the diocese to support the mission of the church in our parish. For example, our clergy are supported by our area dean and archdeacon, who may provide confidential mentoring and pastoral support. Assistant or temporary ministers, including curates, deacons, licensed lay ministers, commissioned lay ministers or persons with Bishop's Permissions may participate in our mission in support of our regular clergy.
- Other persons or organisations operating within the diocese as appropriate;
- Others associated with our church;
- On occasion, other churches with which we are carrying out joint events or activities;

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<sup>1</sup> HMRC: Her Majesty's Revenue and Customs

<sup>2</sup> Consent forms can be found at: [www.stpetersdumblaton.org.uk/data-protection](http://www.stpetersdumblaton.org.uk/data-protection)

- External statutory bodies (police, social care etc) where this is legally required;
- External service providers.

Examples of those with whom we may need to share information are:

- the Bishop's Office
- the Diocesan Board of Finance offices
- the Diocesan Board of Education
- the Parish Giving Scheme
- deanery officers and representatives
- other PCCs in our benefice
- incumbents and clergy in the benefice, deanery or diocese
- the Churches' Child Protection Advisory Service
- the Online Faculty System
- the Diocesan Registrar
- the offices of the Chancellor of the Diocese
- Statutory Consultants, e.g. Historic England, and the Church Buildings Council
- our independent accounts examiner
- our volunteers, organists, choir members and bellringers
- professionals, professional bodies and contractors who provide the PCC with goods or a service
- the Gloucestershire Record Office
- HMRC
- our insurer and bank
- our web service providers
- our email service providers

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

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<sup>3</sup>.

Specifically, we retain electoral roll data; gift aid declarations and associated paperwork which are kept for six years after the calendar year to which they relate; and parish registers (baptisms, marriages, funerals) which are kept permanently.

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<sup>3</sup> Details about retention periods can currently be found in the Record Management Guides located on the Church of England website at: [www.churchofengland.org/more/libraries-and-archives/records-management-guides](http://www.churchofengland.org/more/libraries-and-archives/records-management-guides)

## 7. Your rights and your personal data

Unless overruled by other obligations, or 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 any personal data which the PCC of St Peter's Dumbleton holds about you;
- The right to request that the PCC of St Peter's Dumbleton 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 St Peter's Dumbleton to retain such data;
- The right to withdraw your consent to the processing at any time
- The right to request that the data controller (the PCC) provides the data subject (you) with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability). *[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. *[Only applies where processing is based on legitimate interests, the performance of a task in the public interest or in the exercise of official authority, direct marketing or, in some cases, when processing is for the purposes of scientific/historical research and statistics].*
- The right to lodge a complaint with the Information Commissioners Office.

## 8. Marketing permissions and seeking consent

Whilst there may be an expectation that people involved in the life of the diocese in many ways would expect to receive information from the PCC through email, post, social media etc; the PCC is required through data regulations to ensure that it asks for your permission to do so in certain circumstances; and to ensure that it makes you aware of your rights in doing so.

### **Email and text marketing**

We will ask for your permission to contact you in this way.

### **Postal marketing**

From time to time we may send you information about the parish and the wider diocese and its work unless you have told us you would prefer not to receive this information by post.

### **Bulletins and newsletters**

The PCC will, in the main, require individuals to personally opt in and out of electronically sent information such as church newsletters. This ensures that individuals are able to manage the information they wish to receive.

## 9. Further processing

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

## 10. Changes to this Privacy Notice

The PCC will review this Privacy Notice regularly and may update it at any time - for example in the event of legal changes, to improve how we manage data, or where an issue or concern has come to light that needs appropriate response. If there are any significant changes in the way the PCC processes your personal information we will provide a prominent notice on our website or send you a notification.

## 11. Transfer of Data Abroad

Any personal data transferred to countries or territories outside the UK or the European Economic Area (EEA) will only be processed on systems that ensure an equivalent level of protection. This is achieved through "adequacy" regulations or via standard contractual clauses and data transfer agreements approved by the relevant UK and European authorities.

Please note that as our website is accessible from overseas, certain public-facing personal data (such as information contained in a newsletter) may be accessed by individuals outside of the UK or EEA.

## 12. Contact Details

To exercise all relevant rights, make queries or complaints please in the first instance contact:

PCC Secretary

01386 882049

[info@stpetersdumbleton.org.uk](mailto:info@stpetersdumbleton.org.uk)

Bracklin, Main Street, Dumbleton, Evesham, WR11 7TH.

You can also contact the Information Commissioners Office:

0303 123 1113

<https://ico.org.uk/global/contact-us/contact-us-public/>

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.