

Data Privacy Policy

1. What is the purpose of this notice?

The Parochial Church Council (PCC) of The Collegiate Church of the Holy & Undivided Trinity, with All Saints' Luddington and St. Helen's Clifford Chambers is the data controller (contact details below). This means it decides how your personal data is processed and for what purposes.

We are required under the data protection legislation to notify you of the information contained in this privacy notice.

This notice applies to volunteers, members of our groups and members of the public. This notice does not form part of any contract and we may update this notice at any time.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

We will comply with data protection law. This says that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
Kept securely.

2. Your personal data – what data do we collect, store and use and how do we collect it?

Personal data or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are "special categories" of more sensitive personal data which require a higher level of protection

If you join any of the groups affiliated to the parish, we may collect the information that you provide, including your name, email address, postal address and telephone number. We may also collect some banking details if you pay subscriptions to us.

If you sign up to receive emails from us, then we collect your name and email address only.

If you make a donation, we may collect your banking details and your contact details from the information that you provide.

We may also collect information about your use of our websites, including your IP address, how much time you spend on the site, and which pages you view.

We do not envisage that we will hold information about criminal convictions.

3. How do we use or process your personal data?

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- Where we need to perform the contract we have entered into with you.
- Where we need to comply with a legal obligation.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:

- Where we need to protect your interests (or someone else's interests).
- Where it is needed in the public interest or for official purposes.

We use your personal data (as set out under paragraph 2 above) for the following purposes:

- To act as a church by praying for our parish and those who belong to our churches;
- To fundraise and promote the interests of our churches, its groups and our associated groups of Friends;
- We use your contact details to send you information about the work of the Parish and its groups, only if you have given consent to receive mailings from us.
- To share your contact details with the Diocesan Office so that 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.
- We may use your banking details to process donations you have made to us and to send you a receipt for such donations.
- Sometimes it is necessary for us to process your data to meet our legal obligations, for example when we send data to HMRC to claim Gift Aid.
- When you give us your personal information in connection with making a donation, we will also use this information (never your financial information) for internal reporting and analysis. Please see the section on Legitimate Interests for a description of this processing.

We may also use your data:

- To administer our membership records; and
- To manage our employees and volunteers.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

You are not required to provide personal data to us. However, if you fail to provide us with certain information when requested, this may affect our ability to provide the services you request (for example, we are unable to receive a donation from you if you do not provide your payment information) or our contract with you or we may be prevented from complying with our legal obligations (for example in relation to health and safety).

You will not be subject to decisions that will have a significant impact on you based solely on automated decision making (this takes place where an electronic system use personal information to make a decision without human intervention), unless we have a lawful basis for doing so and we have notified you.

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

For volunteers, we process your personal data to enable us to efficiently and effectively manage your work with us in accordance with our legitimate interests and legal obligations.

For members of other groups, we may process your personal data in connection with internal reporting and analysis because we believe it is necessary for our legitimate organisational interests in creating better events and better communications. We have conducted a legitimate interest assessment to ensure that this processing isn't overridden by your rights or interests. To opt out of this processing, please see our section on Your Rights.

Your explicit consent, so that we can keep you informed about news, events, activities and services and process your gift aid donations and keep you informed about events in and of the Parish.

Processing can be 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.

5. Sharing your personal data

We may share your personal information with third parties where required by law, where it is necessary to administer our relationship with you or where we have another legitimate interest in doing so. This may include members of the church in order to carry out a service to other church members or for purposes connected with the church. We will only share your data with third parties outside of the parish with your consent, however, we may need to share your personal information with a regulator or otherwise to comply with the law.

6. How long do we keep your personal data?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. We keep data in accordance with the guidance set out in the guide "Keep or Bib: Care of your Parish Records" which is available from the Church of England website.

To determine the appropriate retention period for personal data we take account of the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, together with the applicable legal requirements.

Specifically, we retain electoral roll data while it is still current; gift aid declarations and associated paperwork for up to 6 years after the calendar year to which they relate; and parish registers (baptisms, marriages, & funerals) permanently.

7. Your rights and your personal data

It is important that the personal information that we hold about you is accurate and current. Please keep us informed if your personal information changes.

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

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- The right to request a copy of your personal data which the PCC holds about you;
- The right to request that the PCC 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 to retain such data or where you have exercised your right to object to the processing (see below);
- The right to request a restriction is placed on further processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it;
- The right to object to the processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your information for direct marketing purposes;
- The right to lodge a complaint with the Information Commissioners Office; and
- The right to request the transfer of your personal information to another party.

If you would like to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact our Parish Operations Manager at the Parish Office (details below) in writing.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive.

Alternatively, we may refuse to comply with the request in such circumstances. We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to

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exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact our Parish Operations Manager at the Parish Office. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. The contact details can be found at the end of this notice.

8. Further processing

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Where possible, we will seek your prior consent to the new processing purpose.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules where this is required or permitted by law.

9. Data Security

We have put in place measures to protect the security of your information. Details of these measures are available upon request.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

10. Contact Details

To exercise all relevant rights, queries of complaints please in the first instance contact the Parish Operations Manager at office@stratford-upon-avon.org

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