

Data Protection Policy

St Edmund's Church, Crickhowell

Introduction

In order to operate, St Edmund's Church (we/us) needs to gather, store and use certain forms of information about individuals.

These can include church members, employees, contractors, suppliers, volunteers, those using or potentially using our services (such as weddings, baptisms and funerals), business contacts and other people the church has a relationship with or regularly needs to contact.

This policy explains how this data should be collected, stored and used in order to meet St Edmund's Church data protection standards and comply with the General Data Protection Regulations (GDPR).

Why is this policy important?

This policy ensures that we:

- Protect the rights of those whose information we hold
- Comply with data protection law and follow good practice
- Protect the church from the risks of a data breach

Who and what does this policy apply to?

This applies to *all* those handling data on our behalf e.g.:

- Church staff and members
- Employees and volunteers
- Contractors/3rd-party suppliers

It applies to all data that we hold relating to individuals, including:

- Names
- Email addresses
- Postal addresses
- Phone numbers
- Any other personal information held (e.g. medical, financial, prayer needs)

Roles and responsibilities

The Parochial Church Council (PCC) of St Edmund's Church is the Data Controller and will determine what data is collected and how it is used. The Data Protection Coordinator is Simon Large. They are responsible for the secure, fair and transparent collection and use of data by St Edmund's Church. Any questions relating to the collection or use of data should be directed to the Data Protection Coordinator.

Everyone who has access to data as part of St Edmund's Church has a responsibility to ensure that they adhere to this policy.

We use third party Data Processors (e.g. Google and MailChimp) to process data on our behalf. We will ensure all Data Processors are compliant with GDPR.

Data Protection Principles

a) We fairly and lawfully process personal data in a transparent way

We will only collect data where lawful and where it is necessary for the legitimate purposes described.

- An individual's name and address will be collected when they ask to be added to the electoral roll. This data will be publicly displayed at the time the electoral roll is updated each year. An individual can request that the displayed data be anonymised.
 - Lawful basis: Legal Obligation (required by Church in Wales law).
- A member's name and contact details may be collected at any time with their consent, including when they are added to the electoral roll, and will be used to contact them regarding church services, events and other items likely to be of interest to the church membership. They may also opt in to being added to the church members' directory.
 - Lawful basis: Consent
- A member's name and contact details will be collected when they join certain groups within the church, e.g. PCC, worship team, service rotas. This data will be used to contact them regarding the day-to-day business of that group.
 - Lawful basis: Legitimate interest
- An individual's name and contact details may be collected at any time, with their consent, in order for us to communicate with them about and promote relevant church activities.
 - Lawful basis for processing this data: Consent
- An individual's name, contact details and criminal records information will be collected when they take up a position where they are working with children or vulnerable adults, and will be used to carry out a DBS check or verify an existing check. DBS certificate numbers are also kept.
 - Lawful basis: Legitimate interest
- An individual's name, address and financial information will be collected when necessary for claiming Gift Aid. Claiming Gift Aid is consensual, but once the claim has been made then there is a legal obligation to retain this data.
 - Lawful basis: Consent + Legal obligation
- An individual's name and contact details will be collected when they make a booking for an event. This will be used to contact them about their booking and to allow them entry to the event.
 - Lawful basis for processing this data: Contract
- Contact details will be collected from those requesting the services of the church such as baptisms, weddings and funerals. These will be used to contact them regarding the arrangements for the service.
 - Lawful basis: Legitimate interest
- We collect copies of passports and official documents giving proof of address from wedding couples in order to prove their identity and citizenship status.
 - Lawful basis: Legal obligation
- For those wishing to be baptised or confirmed we collect the name of the candidate and their sponsors, as well as baptism status, in order to comply with the requirements of church law.
 - Lawful basis: Legal obligation
- For children taking part in activities organised by the church we collect names and contact details (usually parents') in order to register the children and contact them or their parents regarding

these activities. We also collect medical details which may require special handling or which should be passed on to first aiders and emergency services in the event of an accident.

- Lawful basis: Legitimate interest
- An individual's first name and prayer needs are collected when prayer for them is requested. These are recorded for the purpose of passing on accurate details to members of the intercessions team.
 - Lawful basis: Legitimate interest
- Pseudonymous or anonymous data (including behavioural, technological and geographical/regional) on an individual may be collected via tracking 'cookies' when they access our website or interact with our emails, in order for us to monitor and improve our effectiveness on these channels. See 'Cookies on our website' below.
 - Lawful basis: Consent

b) We only collect and use personal data for specific, explicit and legitimate purposes and will only use the data for those specified purposes.

When collecting data, we will always provide a clear and specific privacy statement explaining to the subject why the data is required and what it will be used for.

c) We ensure any data collected is relevant and not excessive

We will not collect or store more data than the minimum information required for its intended purpose.

E.g. we need to collect email addresses from members in order to be able to contact them about administration matters, but data on their marital status or sexuality will not be collected, since it is unnecessary and excessive for the purposes of administration.

d) We ensure data is accurate and up-to-date

We will ask members, volunteers and staff to inform us of any change to their data. Any individual will be able to update their data at any point by contacting the Data Protection Coordinator.

e) We ensure data is not kept longer than necessary

We will keep records for no longer than is necessary in order to meet the intended use for which it was gathered (unless there is a legal requirement to keep records). The Church in Wales publishes a guidance document called *Keep or Bin* giving retention policies for particular types of data.

When the intended use is no longer applicable (e.g. contact details for a member who has left the church), the data will be deleted within a reasonable period.

f) We keep personal data secure

We will ensure that data held by us is kept secure.

- Electronically-held data will be held within a password-protected and secure environment
- Any passwords for individual electronic data files will be re-set each time an individual with data access leaves their role/position
- Physically-held data (e.g. electoral roll forms) will be stored safely in the responsible person's home, or in a locked room in church or the Ministry Area office.

- Access to data will only be given to relevant people where it is clearly necessary for the running of the group.

g) Transfer to countries outside the EEA

We will not transfer data to countries outside the European Economic Area (EEA), unless the country has adequate protection for the individual's data privacy rights, e.g. by participation in the EU-US Privacy Shield Framework. This is mainly relevant to online data which may be stored on servers outside the EU (usually in the US).

Individual Rights

When we collect, hold and use an individual's personal data, that individual has the following rights over that data. We will ensure our data processes comply with those rights and will make all reasonable efforts to fulfil requests from an individual in relation to those rights.

Individual's rights

- *Right to be informed:* whenever we collect data we will provide a clear and specific privacy statement explaining why it is being collected and how it will be used.
- *Right of access:* individuals can request to see the data we hold on them and confirmation of how it is being used. Requests should be made in writing to the Data Protection Coordinator and will be complied with free of charge and within one month. Where requests are complex or numerous this may be extended to two months
- *Right to rectification:* individuals can request that their data be updated where it is inaccurate or incomplete. We will request that church staff and members check and update their data on an annual basis. Any requests for data to be updated will be processed within one month.
- *Right to object:* individuals can object to their data being used for a particular purpose. We will always provide a way for an individual to withdraw consent in all marketing communications. Where we receive a request to stop using data we will comply unless we have a lawful reason to use the data for legitimate interests or contractual obligation.
- *Right to erasure:* individuals can request for all data held on them to be deleted. Our data retention policy will ensure data is not held for longer than is reasonably necessary in relation to the purpose it was originally collected. If a request for deletion is made we will comply with the request unless:
 - There is a lawful reason to keep and use the data for legitimate interests or contractual obligation.
 - There is a legal requirement to keep the data.
- *Right to restrict processing:* individuals can request that their personal data be 'restricted' – that is, retained and stored but not processed further (e.g. if they have contested the accuracy of any of their data, we will restrict the data while it is verified).

Though unlikely to apply to the data processed by us, we will also ensure that rights related to portability and automated decision making (including profiling) are complied with where appropriate.

Sharing Contact Details

We encourage communication between members and to facilitate this we publish a directory of contact details for members who give consent to being included. This directory is available only to church staff and

members. If a church member requests contact details for another member, that request can be granted if the data subject has given consent to their details appearing in the directory, even if the directory has not yet been updated. If no consent has been given then the data will not be shared.

How We Get Consent

We will regularly collect data from consenting individuals for marketing purposes. This includes contacting them to promote events, updating them about church news, fundraising and other activities.

Any time data is collected for this purpose, we will provide:

- A method for users to show their positive and active consent to receive these communications (e.g. a 'tick box')
- A clear and specific explanation of what the data will be used for (e.g. 'Tick this box if you would like St Edmund's Church to send you email updates with details about our forthcoming events, fundraising activities and opportunities to get involved')

Data collected will only ever be used in the way described and consented to (e.g. we will not use email data in order to market 3rd-party products unless this has been explicitly consented to).

Every marketing communication will contain a method through which a recipient can withdraw their consent (e.g. an 'unsubscribe' link in an email). Opt-out requests such as this will be processed within 14 days. Unsubscribe links are usually effective immediately.

Cookies On Our Website

A cookie is a small text file that is downloaded onto 'terminal equipment' (e.g. a computer or smartphone) when the user accesses a website. It allows the website to recognise that user's device and store some information about the user's preferences or past actions.

We use cookies on our website crickhowellparish.org.uk in order to monitor and record activity. This allows us to improve users' experience of our website by, for example, allowing for a 'logged in' state, and by giving us useful insight into how users as a whole are engaging with the website.

We will include a link to our Privacy Notice which outlines what cookies are used for and how cookies can be disabled in the most common browsers.