



DATA PRIVACY NOTICE

The Parochial Church Council (PCC) of St Paul's Church Letchworth

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 Paul's Letchworth is the data controller for all information used to organise and administer church business and activities. This means it decides how your personal data is processed to support the life of the church, including how it meets its obligations to report certain statistical information to the Church of England and the Charities Commission.

3. How do we process your personal data?

The PCC of St Paul's Letchworth 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, by ensuring that appropriate technical measures are in place to protect personal data.

St Paul's PCC processes personal data in the following ways:-

- Maintaining statutory registers for baptisms and marriages
- Maintaining records on giving which comply with HMRC regulations on claiming Gift Aid.
- Managing church business through ChurchSuite, a secure database, which holds information on church membership and church activities, (individual contacts, groups, rotas, calendar and bookings)
- Recording of CCTV

We use your personal data for the following purposes: -

- To enable us to provide a voluntary service for the benefit of the public in our Parish;
- To administer the electoral roll;
- To administer a church address book which facilitates contact between individuals;
- To manage our employees and volunteers, including managing compliance with safeguarding and health and safety requirements and managing rotas for church activities;
- To provide a GDPR compliant means of communication to designated groups and between group members;
- To maintain our own accounts and records (including the processing of Gift Aid applications);
- To promote the interests of the church, including stewardship and fundraising;
- To inform church members and others connected to the church of news, events, activities and services running at St Paul's

- To aid the security and safety of our premises by using CCTV for preventing criminal acts on the premises and for aiding statutory law enforcement agencies should criminal acts occur. Data captured by CCTV is not used or accessed for other purposes.

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

- *'Legal obligation'* is the basis for holding personal data which we are legally required to hold. For example, maintaining marriage and baptism registers, complying with HMRC requirements to claim Gift Aid, maintaining personal data on PCC members for the Charities Commission and recording and reporting of accidents in accordance with HSE requirements. It also is the basis for processing personal data for the purpose of the Church Representation Rules, which includes maintain the electoral roll, conducting elections to the PCC and Deanery Synod, electing churchwardens and appointing officers to roles specified in the regulations.
- *'Legitimate interest'* is the basis for holding personal data necessary to administer church business and activities. This includes, holding data on membership of church groups, managing rotas, keeping a register of children and young people involved in church related activities, managing annual stewardship campaigns, meeting the requirements of the House of Bishops' Policy and Guidance on Safe Recruitment and fulfilling the diocesan annual statistical reporting requirements.
- *'Special category data'* which we process relates specifically to religious affiliation and is processed by virtue of our *'legitimate interest'*. We are entitled to hold this data because we are a religious not-for-profit organisation and:-
 - the processing relates only to members or former members (or those who have regular contact with St Paul's in connection with its purposes); and
 - we will never disclose personal data to a third party without explicit consent.
- *'Consent'* for processing personal data will be sought and recorded for any use which does not fall within the above categories. For example consent to receive information about church news, events, activities and services. You will also able to select your preferences on how you receive communication and exercise your right to restrict processing in so far as this right does not conflict with the church's need to fulfil its *legal obligations* or *legitimate interests*. Special category data other than religious affiliation will also be processed by *'consent'*. Examples include information about health (allergies, special or additional needs) which is necessary to ensure that we can provide a safe service and also data on ethnicity which has previously been subject to a diocesan statistical data collection on which we were at that time unable to respond.

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. We will only share your data with third parties outside of the parish with your consent.

6. How long do we keep your personal data¹?

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

¹ 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>

[\[www.churchofengland.org/sites/default/files/2017-11/care_of_parish_records_keep_or_bin_-_2009_edition.pdf\]](http://www.churchofengland.org/sites/default/files/2017-11/care_of_parish_records_keep_or_bin_-_2009_edition.pdf)].

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

7. Your rights and your personal data

Unless 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 your personal data which the PCC of St Paul's, Letchworth holds about you;
- The right to request that the PCC of St Paul's, Letchworth 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 Paul's, Letchworth to retain such data;
- The right to withdraw your consent to the processing at any time
- The right to request that the data controller provide the data subject with his/her personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable) *[This 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, (where applicable) *[This only applies where processing is based on legitimate interests direct marketing and processing for the purposes of scientific/historical research and statistics]*
- The right to lodge a complaint with the Information Commissioners Office.

8. Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Protection Notice, 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 of complaints please in the first instance contact the Parish Administrator at St Paul's Church Office, 179 Pixmore Way, Letchworth Garden City, SG6 1QT or hello@stpaulsletchworth.co.uk

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