

The Church of St Michael and All Angels, Ledbury

GENERAL PRIVACY NOTICE



Your personal data – what is it?

“Personal data” is any information about a living individual which allows them to be identified from that data (for example a name, photographs, videos, email address, or address). Identification can be by the information alone or in conjunction with any other information. The processing of personal data is governed by the General Data Protection Regulation 2016/679 (the “GDPR”) and other legislation relating to personal data and rights such as the Human Rights Act 1998.

Who are we?

This Privacy Notice is provided to you by the Parochial Church Council (PCC) of St Michael and All Angels Church, Ledbury, which has nominated an Assistant Church Warden as the Data Administrator and an assistant Data Administrator for your data. This means the PCC decides how your personal data is processed and for what purpose.

The Church of England is made up of several different organisations and office-holders who work together to deliver the Church’s mission in each community. The PCC works together with:

- the incumbent of the parish (that is, our Rector);
- the bishop(s) of the Diocese of Hereford including the Bishop of Ludlow.

As the Church is made up of all these persons, we may need to share personal data we hold with them so that they can carry out their responsibilities to the Church and our community. The organisations referred to above are joint Data Administrator. This means we are all responsible to you for how we process your data.

Each of the Data Administrator has their own tasks within the Church and a description of what data is processed and for what purpose is set out in this Privacy Notice. This Privacy Notice is provided for you by the PCC on its own behalf, our Rector and on behalf of the Data Administrator(s) for the Diocese of Hereford. In the rest of this Privacy Notice, we use the word “we” to refer to each Data Administrator, as appropriate.

What data do the data administrators listed above process?

They will process some or all the following where necessary to perform their tasks: •

- Names, titles, and aliases, 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, nationality, education/work histories, academic/professional qualifications, hobbies, family composition, and dependants;
- Where you make donations or pay for activities such as use of a church hall, financial identifiers such as bank account numbers, payment card numbers, payment/transaction identifiers, policy numbers, and claim numbers;
- The data we process is likely to constitute sensitive personal data because, as a church, the fact that we process your data at all may be suggestive of your religious beliefs. Where you provide this information, we may also process other categories of sensitive personal data: racial or ethnic origin, sex life, mental and physical health, details of injuries, medication/treatment received, political beliefs, labour union affiliation, genetic data, biometric data, data concerning sexual orientation and criminal records, fines and other similar judicial records.

How do we process your personal data?

The Data Administrators will comply with their legal obligations to keep personal data up to date; to store and destroy it securely; to not collect or retain excessive amounts of data; to keep personal

data secure, and to protect personal data from loss, misuse, unauthorised access and disclosure and to ensure that appropriate technical measures are in place to protect personal data.

We use your personal data for some or all 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 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 deliver the Church's mission to our community, and to carry out any other voluntary or charitable activities for the benefit of the public as provided for in the constitution and statutory framework of each Data Administrator;
- To administer the parish, deanery, archdeaconry and diocesan membership records;
- To fundraise and promote the interests of the Church and charity;
- To maintain our own accounts and records;
- To process a donation that you have made (including Gift Aid information);
- 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 rotas for Readings, Intercessions and other rotas;
- To send you communications campaigns, appeals, other fundraising activities;
- To process a grant or application for a role;
- To enable us to provide a voluntary service for the benefit of the public in a geographical area as specified in our constitution;
- To enable us to provide a voluntary service for the benefit of the public in the Ledbury area as specified in our constitution;
- To administer membership records e.g. Parochial Electoral Roll;
- To fundraise and promote the interests of charitable organizations including the church of St Michael and All Saints.;
- 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 Michael and All Angels, Ledbury;
- To share your contact details with the Diocesan office so 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.
- Our processing includes the use of CCTV systems for the prevention and prosecution of crime;

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 respect 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.

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.

As a Religious organisation we are also permitted to process information about your religious beliefs to administer membership or contact details.

Where your information is used other than in accordance with one of these legal bases, we will first obtain your consent to that use.

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 us your prior consent. It is likely that we will need to share your data with the following (but only where necessary):

- The appropriate bodies of the Church of England including the other Data Administrator controllers;
- Our agents, servants and contractors. For example, we may ask a commercial provider to send out newsletters on our behalf, or to maintain our database software;
- Other clergy or lay persons nominated or licensed by the bishops of the Diocese of Hereford 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 of Hereford including, where relevant subsidiary bodies;
- On occasion, other churches with which we are carrying out joint events or activities.

How long do we keep your personal data?

We will keep some records permanently if we are legally required to do so. We may keep some other records for an extended period. For example, it is current best practice to keep financial records for a minimum period of seven years to support HMRC audits. In general, we will endeavour to keep data only for as long as we need it. This means that we may delete it when it is no longer needed.

Your rights and your personal data

When exercising any of the rights listed below, to process your request, we may need to verify your identity for your security. In such cases we will need you to respond with proof of your identity before you can exercise these rights.

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

1. At any point you can contact us to request the information we hold on you and why we have that information, who has access to the information and where we obtained the information from. Once we have received your request we will respond within one month. There are no fees or charges for the first request but additional requests for the same data may be subject to an administrative fee.
2. The right to request that the PCC of St Michael and All Angels, Ledbury, corrects and/or update 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 Michael and All Angels, Ledbury to retain such data. When we receive your request, we will confirm whether the data has been deleted or the reason why it cannot be deleted (for example because we need it for our legitimate interests or regulatory purpose(s)).

3. The right to withdraw your consent to the processing at any time. Upon receiving the request, we will contact you and let you know if we are able to comply or if we have legitimate grounds to continue to process your data. Even after you exercise your right to object, we may continue to hold your data to comply with your other rights or to bring or defend legal claims. You can withdraw your consent easily by telephone, email, or by post (see Contact Details below). 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;
4. The right to request that the Data Administrator provide the data subject with his/her personal data and where possible, to transmit that data directly to another Data Administrator, (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 Administrator processes the data by automated means*]. See also **Transfer of Data Abroad** below.
5. The right to object to the processing of personal data and request we stop processing your data, (where applicable) [*Only applies where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics*]
6. The right to lodge a complaint with the Information Commissioners Office.

Further processing

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

Contact Details

Please contact us if you have any questions about this Privacy Notice or the information we hold about you or to exercise all relevant rights, queries or complaints by contacting the Data Administrator nominated by the PCC of the church of St Michael and All Angels through the church office (Telephone Number 01531 631 531 or via email ledbury.ministry@talktalk.net)

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.