

DATA PRIVACY NOTICE

The Parochial Church Council (PCC) of St. Stephen's, Barbourne, Worcester.

Since the 25th of May 2018, the processing of personal data has been governed by the General Data Protection Regulation (GDPR). At St. Stephen's we are committed to meeting our obligations under the GDPR and will ensure that any information we have relating to you is held securely and used only in accordance with the Regulation.

The following details explain how we use your personal data, the legal basis for holding it and your rights under the Regulation.

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 data can be held in electronic and paper (hard copy) formats.

In the Regulation you are referred to as "the data subject" that is, the person on whom the Parochial Church Council (PCC) of St Stephen's holds personal data.

2. Who are we?

For the purposes of the Regulation, the PCC of St. Stephen's is the data controller (contact details below). This means it decides how your personal data held by the PCC is processed and what it is used for.

3. How do we process your personal data?

The PCC of St. Stephen's 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 measures are in place to protect personal data.

We use your personal data for the following purposes: -

- to enable us to provide a voluntary service for the benefit of the public;
- to administer the church's Electoral Roll;
- to administer the hiring of the Church and the Bishop Allenby Hall;
- 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 at St. Stephen's.

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

Insofar as GDPR applies to the activities and responsibilities of the PCC:-

- GDPR permits the use of personal data without explicit consent where:
 - processing is necessary for the performance of a contract to which the data subject is party, or to take steps at the request of the data subject prior to entering into a contract;
 - processing is necessary for compliance with a legal obligation to which the data controller is subject;
 - processing is necessary for carrying out obligations under employment, social security or social protection law, or a collective agreement;
 - processing is carried out during its legitimate activities, with appropriate safeguards, by a not-for-profit body with a religious aim on condition that 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.
- Explicit consent of the data subject is required for the processing of their personal data for one or more purposes specified in Article 9 1 of the Regulation¹.
St. Stephen's PCC is unlikely to need to use personal data for such purposes.

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 for purposes connected with the church. We will only share your data with third parties (i.e. groups or organisations not directly associated with the PCC) if we have your explicit consent.

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..? The Care of Your Parish Records* which is available from the Church of England website.²

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. The oldest records may be transferred to the Diocesan Archive, to be held securely at The Hive in Worcester.

7. Your rights and your personal data

Unless subject to an exemption under GDPR, you have the following rights with respect to your personal data held by St. Stephen's PCC: -

¹ Processing of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation is prohibited unless the data subject has given explicit consent.

² Details about retention periods are given in the *Records Management Guides* on the Church of England website <https://www.churchofengland.org/more/libraries-and-archives/records-management-guides>

- the right to request a copy of your personal data which the PCC of St. Stephen's holds about you;
- the right to request that the PCC of St. Stephen's 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. Stephen's 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) [*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) [*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*];
- 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, processing conditions and legal basis. Where and whenever necessary, we will always seek your prior explicit consent to the new processing.

9. Review and approval

This notice will be subject to annual review by the PCC, or as and when required.

10. Contact Details

To exercise all relevant rights, queries or complaints please in the first instance contact Michelle Walsh, Parish Administrator on 07961 097497 or email: mwalsh.ststephens@outlook.com

You can contact the Information Commissioners Office (ICO) on 0303 123 1113 or via the ICO website at <https://ico.org.uk> or by mail at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.