SWP PCC Privacy & Data Protection Policy



About us

The Sherbornes with Pamber Parochial Church Council is responsible for the running of the churches in this parish within the Diocese of Winchester. This includes the building up of the church within the parish, promoting the Gospel in the name of Jesus, evangelising and supporting the preaching and teaching for the spiritual development of the church family.

The person responsible for Data Control within The Parish of The Sherbornes with Pamber is: Andy Spence (The PCC Secretary).

What is personal data?

Personal data is defined as any information relating to an identified or identifiable natural person (the "data subject") The processing of personal data is governed by the GDPR.

The lawful basis for processing your personal data

All organisations need a lawful basis to collect and use personal data. In accordance with GDPR, we can legally process your personal information because you have given us your consent to collect, process and store your personal data by signing a contract with us.

Processing your personal data

We collect personal data in order to be able to offer the best advice for your circumstances. We will only use any personal information you have chosen to provide to us, for the purpose that you provided it for.

We will not use your personal data for any other purpose without your consent. We will not disclose your personal data to any third parties without your consent, except where we are required to do so by law. We will never sell or receive payment for licensing or disclosing your personal information.

Statistics gathered to monitor the service for the purposes of identifying any policy issues and to support funding applications will be anonymised to prevent identification of individual users.

Data protection principles

We comply with our 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

Our purpose for processing your personal data including special category data

In order to comply with the Financial Conduct Authority's Consumer Credit Sourcebook Regulations we are required to obtain all relevant data in order to be able to offer you the best advice based on your circumstances. This may include processing Special Category Data such as health information or other data of a sensitive nature.

We will only collect Special Category Data if there is a clear reason for doing so, such as where we need this information to ensure that we provide appropriate advice or support to you. We will only use sensitive information for the purposes for which it is provided.

Your data rights

Under data protection law, you have rights we need to make you aware of. The rights available to you depend on our reason for processing your information.

a) Your right of access

You have the right to ask us for copies of your personal information. There are some exemptions, which mean you may not always receive all the information we process. You can read more about this on the ICO website: https://ico.org.uk/your-data-matters/your-right-of-access/

b) Your right to get your data corrected

You have the right to ask us to correct any information we hold about you which you think is inaccurate. This is also known as the "right to rectification". You also have the right to ask us to complete information you think is incomplete. You

can read more about this right here: https://ico.org.uk/your-data-matters/your-right-to-get-your-data-corrected/

c) Your right to erasure

You have the right to ask us to erase your personal information in certain circumstances. This is known as the right to erasure. This is also known as "the right to be forgotten". You can read more about this right here: https://ico.org.uk/your-data-matters/your-right-to-get-your-data-deleted/

d) Your right to restriction of processing

You have the right to ask us to restrict the processing of your information in certain circumstances. You can read more about this right here: https://ico.org.uk/your-data-matters/your-right-to-limit-how-organisations-use-your-data/

e) Your right to object to processing

You have an absolute right to stop the processing of your personal data for direct marketing purposes. However, we may still be able to legitimately continue using your data for other purposes. You can read more about this right here: https://ico.org.uk/your-data-matters/the-right-to-object-to-the-use-of-your-data/

f) Your right to data portability

You have the right to ask that we transfer the information you gave us to another organisation, or give it to you. This right to only applies to electronically held data that you have provided to us and we are processing with your consent. You can read more about this right here: https://ico.org.uk/your-data-matters/your-right-to-data-portability/

Your right to withdraw consent

Where we are using your personal information based on your consent, you have the right to withdraw that consent at any time by contacting our Data Controller, verbally or in writing.

Your right to complain

You have the right to be confident that we will handle your personal information responsibly and in line with good practice. If you have concerns about the way we are handling your information, please contact our Data Controller (Stuart Brack) in the first instance as we have a dedicated complaints procedure.

If you are unhappy with how your complaint has been handled by us or if we have failed to resolve your information rights concern, you can raise the matter with the Information Commissioner's Office by calling them on 0303 123 1113 or via email https://ico.org.uk/global/contact-us/email/ or by writing to the ICO, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.

Exercising your rights

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 considered to be "manifestly unfounded or excessive." Alternatively, we may refuse to comply with the request in such circumstances. You will be informed of this in writing, where this is the case. We have one month to respond to your request. In certain circumstances we may need extra time to consider your request and can take up to an extra two months. If we are going to do this, we will let you know within one month that we need more time and why.

Please contact our Parish Administrator (<u>admin@sherborneswithpamber.org</u>) if you wish to make a request to access your personal informational held by the Parish of The Sherbornes with Pamber.

Sharing your information with third parties

Your personal data will be treated as strictly confidential.

Data Protection Policy

The Sherbornes with Pamber PCC (The PCC) uses personal data about living individuals for the purpose of general church administration and communication.

The PCC recognises the importance of the correct and lawful treatment of personal data. Personal data, whether it is held on paper, on computer or other media, will be subject to the appropriate legal safeguards as specified in the General Data Protection Regulation 2017 Legitimate Interest 6(1)(f), Contract

6(1)(b) or Legal Obligation 6(1)(c) clauses of the General Data Protection Regulations.

The PCC fully endorses and adheres to the eight principles of the GDPR. (see below) These principles specify the legal conditions that must be satisfied in relation to obtaining, handling, processing, transportation and storage of personal data. Employees and any others who obtain, handle, process, transport and store personal data for the PCC must adhere to these principles.

The Principles

The principles require that personal data shall: 1. Be processed fairly and lawfully and shall not be processed unless certain conditions are met. 2. Be obtained for a specified and lawful purpose and shall not be processed in any manner incompatible with that purpose. 3. Be adequate, relevant and not excessive for those purposes. 4. Be accurate and kept up to date. 5. Not be kept for longer than is necessary for that purpose. 6. Be processed in accordance with the data subject's rights. 7. Be kept secure from unauthorised or unlawful processing and protected against accidental loss, destruction or damage by using the appropriate technical and organisational measures. 8. Not be transferred to any other country unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

1. Maintaining Confidentiality

The PCC will treat all your personal information as private and confidential and not disclose any data about you to anyone other than church members, and the leadership team of the church in order to facilitate the administration and day-to-day ministry of the church.

The PCC staff and volunteers who have access to Personal Data will be required to agree to sign a Confidentiality Policy and a Data Protection Policy.

There are four exceptional circumstances to the above permitted by law: 1. Where we are legally compelled to do so. 2. Where there is a duty to the public to disclose. 3. Where disclosure is required to protect your interest. 4. Where disclosure is made at your request or with your consent.

2. Use of Personal Information

The PCC will use your data for three main purposes:

1. The day-to-day administration of the church; e.g. pastoral care and oversight including calls and visits, preparation of ministry rotas, maintaining financial records of giving for audit and tax purposes. 2. Contacting you to keep you informed of church activities and events. 3. Statistical analysis; gaining a better understanding of church demographics. N.B. although collated church data may be passed to a third party, such as number of small groups or small groups attendance, no personal data will be disclosed.

3. The Database

Information contained on the database will not be used for any other purposes than set out in this section. The database is accessed through the internet and therefore, can be accessed through any computer or smart device with internet access. The server for the database is in the UK and hosted by ChurchSuite. The data held is encrypted and is backed-up each day.

- 1. Contacts are asked to add their own contact details and keep them updated.
- Contact details are by default set as "not visible" which means they can
 only be seen by Administrators and selected Ministry Overseers. Contacts
 may choose to set their details as visible to other members of the church
 community who have access to MyChurchsuite.
- 3. Access to MyChurchsuite and Churchsuite is strictly controlled through the use of name specific passwords, which are selected by the individual.
- 4. Those authorised to use the database have access only to their specific area of use within the database. This is controlled by the Data Controller and other specified administrators. These are the only people who can access and set the security parameters.
- 5. People who will have secure and authorised read and use access to the database include PCC Staff and selected Ministry Overseers.
- 6. Group emails relating to church business will normally be sent through ChurchSuite which has several features for Data Protection regulation compliance including an 'Unsubscribe' button on all emails. e.g. Homegroup leaders communicate to their HG or an email to all women about a women's ministry event.

- 7. The database will NOT be accessed by any authorised users outside of the EU, in accordance with the Data Protection Act, unless prior consent has been obtained from the individual whose data is to be viewed.
- 8. All access and activity on the database is logged and can be viewed by the Data Controller.
- 9. Subject Access all individuals who are the subject of personal data held by The PCC are entitled to: Ask what information the church holds about them and why. Ask how to gain access to it. Be informed how to keep it up to date. Be informed what The PCC is doing to comply with its obligations under the 1988 Data Protection Act.
- 10. Personal information will not be passed onto any third parties outside of the church environment.
- 11. Subject Consent The need to process and communicate information for normal purposes has been communicated to all existing data subjects. New members will be asked to sign a consent form.
- 12. Downloads of data from ChurchSuite must be to password protected devices only. Downloaded data should be destroyed as soon as possible and not kept for more than a year.
- 13. Print outs should be kept in locked rooms, drawers or cabinets and should not be kept for longer than one year. They should never be left in public places (Note: The church is a public place).

Rights to Access Information

Everyone whose personal data is held by the Parish of The Sherbornes with Pamber is able to access their data within ChurchSuite and correct their data if it is incorrect. The PCC have the right to access any personal data that is being held about them. They also have a right to view any data held about them in manual filing systems. This right is subject to certain exemptions: Personal Information may be withheld if the information relates to another individual. Any person who wishes to exercise this right should make the request in writing to the PCC Data Officer, using the standard letter which is available online from www.ico.gov.uk

If personal details held manually are inaccurate, they can be amended upon request. The PCC aims to comply with requests for access to personal information as quickly as possible, but will ensure that it is provided within 30 days of receipt of a completed form unless there is good reason for delay. In such cases, the reason for delay will be explained in writing to the individual making the request.