

Data Privacy Policy

Christ Church, Weston-super-Mare

Registered Charity No. 1134074



Data Controller: The Parochial Church Council of the Ecclesiastical Parish of Christ Church, Weston-super-Mare, known as 'Christ Church'

Data Protection Lead: Church Administrator, on behalf of the PCC

This is the Privacy Statement and Data Protection Policy for Christ Church. It covers how we will store and process your data, what data we hold, your individual rights and how you can interact with us about your data. As with all Policy Statements, it is a bit wordy! But don't let this put you off! If you need to, you are welcome to get in touch with our Data Protection Lead. We are here to help!

This Policy covers our storing and processing of **personal data**, which 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). This may be you! Identification can be by the information alone or in conjunction with any other information.

Our **processing of personal data** is governed by the Data Protection Act 2018 (which incorporates 'GDPR').

Who are we?

This Privacy Policy is provided to you by The Parochial Church Council of the Ecclesiastical Parish of Christ Church, Weston-super-Mare (Registered Charity No. 1134074) which is the **Data Controller** for your data.

How is your data used and processed?

Christ Church processes data containing:

- names, titles, aliases, photographs;
- contact information including telephone numbers, postal/residential addresses, and email addresses;
- where there is a legitimate interest to facilitate our charitable aims and activities, or where you have provided 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 give financially in support of Christ Church or pay for church activities (e.g. event bookings etc), financial identifiers such as bank account numbers, payment card numbers, payment/transaction identifiers, policy numbers, and claim numbers;
- as a Church (religious organisation), the data we process is likely to constitute sensitive personal data because the very fact that we process your data at all may be suggestive of your religious beliefs.

As a **Data Controller**, all our appointed persons 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/disclosure, and to ensure that appropriate technical measures are in place to protect personal data. If you have any concerns about how your data is being used, please speak with our Data Protection Lead.

What are we doing with your data?

We only hold data that either we are legally obliged to or that helps us fulfil our missional and charitable aims as a Church. We are a membership organisation and good communication with our membership is an essential part of being Church.

Therefore, we will hold and process data 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;
- comply with and facilitate our 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 (please see our Safeguarding Policy);
- help you grow as a disciple, to minister to you, and provide you with pastoral and spiritual care (such as visiting you when you are ill or bereaved) and to organise and perform ecclesiastical services for you such as baptisms, confirmations, weddings, and funerals;
- deliver our 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 our charitable organisation;
- administer our membership records of adult and child members;
- enable us to follow up membership, course, and event enquiries;
- fundraise and promote the interests of the Church and charity;
- maintain our own accounts and records;
- process and record financial donations that you have made (including Gift Aid information);
- communicate with you about your views or comments;
- update you about changes to our services, events, role holders, and any matters of interest related to the Church community;
- send you communications which you have requested and that may be of interest to you - these may include information about events, activities, services, campaigns, appeals, or other fundraising activities;
- process a grant or application for a role;
- manage our employees and volunteers;
- enable us to provide a voluntary service for the benefit of the public in a particular geographical area as specified in our constitution (the Parish).

What is our legal basis for processing your personal data?

- Most of our data is processed because it is necessary for our legitimate interests: to enable our charitable and missional aims, e.g. maintaining membership records, safeguarding our children, recording our financial donations, and operating team rotas for the effective function of Sunday services.
- Some of our processing is necessary for compliance with a legal obligation: retaining safeguarding records and gift aid declarations are examples of this. Also, 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 provide a direct service to you (e.g. if you buy tickets for a church event, etc).
- As a religious organisation, we are 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.

Will we share your data?

You can be reassured that we will treat your personal data as strictly confidential. It will only be shared with third parties where it is necessary for the performance of our tasks and where you first give us your prior consent. It is likely that we will need to share your data with some or all of the following (but only where necessary):

- other parts of the Synodical structure - in our case the Diocese of Bath and Wells and Locking Deanery. Each of these bodies will have their own Privacy Policies.
- any agents, servants, and contractors (for example, we utilise commercial providers to undertake maintenance contracts).
- on occasion, other churches with which we are carrying out joint events or activities.

How long will we keep your personal data?

Our general rule is to keep data no longer than necessary. Where you continue to actively engage with our church services, activities, and events we will retain the appropriate membership data for you so that we can best serve your involvement. We operate to an annual process of review, by which we assess who is actively engaging in church membership and, where this is not the case, we will remove your data. Additionally:

- we will keep some records permanently if we are legally required to do so (for example, this covers Service/Wedding/Baptism Registers and some safeguarding records).
- we may keep some other records for an extended period of time (for example, it is current best practice to keep financial records for a minimum period of seven years to support HMRC audits).

What are your rights in regards to your personal data?

You have the following rights with respect to your personal data (when exercising any of the rights listed below, in order 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):

- **The right to access information we hold on you** - at any point you can contact us to request the information we hold on you as well as 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.
- **The right to correct and update the information we hold on you** - if the data we hold on you is out of date, incomplete, or incorrect you can inform us and your data will be updated.
- **The right to have your information erased** - if you feel that we should no longer be using your data, or that we are illegally using your data, you can request that we erase the data we hold. 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)).
- **The right to object to processing of your data** - you have the right to request that we stop processing your data. 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.
- **The right to data portability** - you have the right to request that we transfer some of your data to another data controller (e.g. to another Church). We will comply with your request, where it is feasible to do so, within one month of receiving your request.

- **The right to withdraw your consent to the processing, at any time, for any processing of data to which consent was sought** - you can withdraw your consent easily by telephone, email, or by post (see contact details below).
- **The right to lodge a complaint with the Information Commissioner's Office** - you can contact the Information Commissioners Office via telephone: 0303 123 1113 or via the internet: <https://ico.org.uk/global/contact-us/> or via post: The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

Transfer of Data Abroad

Our website is accessible from overseas so, on occasion, some personal data (for example, in a newsletter) may be accessed from overseas. However, it is our general practice not to publish any personal data other than names on our website or in our printed notice sheets.

Further Processing

If we wish to use your personal data for a new purpose, not covered by this Policy, then we will provide you with notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Wherever and whenever necessary, we will seek your prior consent to the new processing.

Protection Of Data

A number of church members have password-controlled access to digitally stored information (e.g. website, Dropbox, etc.). Some of these passwords are shared within a small team. Where a member of the team leaves the church, the relevant passwords should be changed.

This Policy document should be reviewed by the PCC every year.

You are very welcome to get in contact with us...

If you have any queries or concerns about how we use your data, please do get in contact with us.

Our Data Protection Lead is the Church Administrator who can be contacted at:

Address: Christ Church Office, 16 Montpelier, Weston-super-Mare, BS23 2RH

Email: office@ccwsm.org.uk

Tel: (01934) 641016

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