



CHURCH OF THE GOOD SHEPHERD, CARSHALTON BEECHES

PRIVACY NOTICE

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1. Introduction

Our church values everyone who engages with us by whatever means, and we do all that we can to protect your privacy and to make sure that any personal data you provide to us is kept safe and secure.

2. Personal data

'Personal data' is any information about a living individual which allows them to be identified from that data (e.g. name, photograph, video, phone number, postal address, email address). The processing of personal data is governed by the Data Protection Act (DPA), the General Data Protection Regulation (GDPR) and other legislation relating to personal data and rights such as the Human Rights Act.

3. Who we are

We are the Parochial Church Council (PCC) of the Church of the Good Shepherd, Carshalton Beeches, and we are the Data Controller (contact details are provided at the end of this policy) for your data. The Church of England comprises a number of different organisations and office-holders who work together to deliver the Church's mission in each community. We work together with the incumbent of the parish (our Vicar) and the Diocese of Southwark.

Because all of these people and organisations work together to govern the Church, we may need to share personal data that we hold with them so that they can carry out their responsibilities to the wider Church and our community. The organisations referred to above are therefore 'Joint' Data Controllers. Each of these 'Joint' Data Controllers have 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 means that all of the 'Joint' Data Controllers are responsible to you for how your data is processed and for what purposes. We use the word "we" to refer to each Data Controller as may be appropriate.

4. The personal data that we may collect from you

We may collect and process any of the following types of personal data. We will process such information as considered necessary and appropriate to perform our tasks and to comply with our legal and contractual obligations:

- ✝ Names, titles, photographs, images
- ✝ Contact details including landline home, work and personal mobile telephone numbers, postal and email addresses, social media contact details.
- ✝ 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, hobbies, family composition, and dependants.
- ✝ Additional operational personal data created, obtained, or otherwise processed in the course of carrying out our activities, including but not limited to, CCTV footage, recordings of telephone conversations, IP addresses, visitor records, logs of accidents, injuries and insurance claims.



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In certain circumstances such as employment we may also collect and process the following types of personal data:

- ✝ Education and work histories, academic and professional qualifications, employment details.
- ✝ Non-financial identifiers such as passport numbers, driving license numbers, vehicle registration numbers, taxpayer identification numbers, employee identification numbers, tax reference codes, and national insurance numbers.
- ✝ Financial identifiers such as bank account numbers, payment card numbers, payment/transaction identifiers.
- ✝ Financial information such as salary, bonus, record of earnings, tax and benefits contributions, expenses claimed.
- ✝ Emergency contact information, gender, birth date, referral source (e.g. agency, employee referral), performance management information, languages and proficiency, licences and certificates, citizenship, immigration status, employment status, billing rates and employment references.

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: allergies and food or other intolerances, Disclosure and Barring Service (DBS) checks, criminal records, fines and other similar judicial records.

5. Ways we collect your personal data

We may collect or be provided with information by any of the following:

- ✝ In person with us: For example when you provide contact details in writing to us or our volunteers, request materials or information, sign up for an event, make a donation, register yourself or your children into a group or at a church event or function, or otherwise provide your personal details.
- ✝ Electronically with us: when you send us or our volunteers communications (e.g. e-mail, SMS, MMS), interact with our website or our Data Processor using ChurchSuite or associated resource.
- ✝ Through third parties: we may obtain data through third parties such as:
 - Charities, where you have agreed to support them, our Church or our mission.
 - Data available on social media, for example, Twitter, Facebook or the like.

You may wish to check third party privacy policy to find out more information on how they will process your data.



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6. *How we may process your personal data*

The Data Controllers will make every endeavour to comply with their obligations under GDPR by keeping and/or enabling personal data to be kept up-to-date, by storing it securely, by destroying it appropriately, by not collecting or retaining excessive amounts of data, by protecting personal data from loss, misuse, unauthorised access and disclosure and by taking measures to protect personal data.

7. *Why we require and use your personal data*

We use your personal data for some or all of the following purposes:

- ✚ To enable us to meet all legal and statutory obligations (e.g. electoral roll).
- ✚ To carry out comprehensive safeguarding procedures (including due diligence and complaints handling) in accordance with best safeguarding practice with the aim of ensuring that all children and vulnerable adults are provided with safe environments.
- ✚ 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.
- ✚ To notify you of duty rotas, changes to our services, events, staff and volunteers.
- ✚ To administer our church, its groups and activities, the parish, deanery, archdeaconry and diocesan membership records.
- ✚ To minister to you and provide you with pastoral and spiritual care (e.g. visits to those who are ill or bereaved) and to organise and perform ecclesiastical services for you such as baptisms, confirmations, weddings and funerals.
- ✚ To fundraise and promote the interests of the church and charity.
- ✚ To maintain our own accounts and records.
- ✚ To seek your views or comments.
- ✚ To process a donation that you have made (including Gift Aid information).
- ✚ To send you communications which you have requested and that may be of interest to you. These may include information about training, events, groups, campaigns, appeals, other fundraising activities.
- ✚ To process an application for a role.
- ✚ To manage our employees, volunteers, contractors, agents, retirees, beneficiaries etc.
- ✚ We will process data about all employees and volunteers for legal, personnel, administrative and management purposes and to enable us to meet our legal obligations, for example to pay staff and monitor their performance.
- ✚ To provide an interactive website.
- ✚ To enable us to prepare and sometimes publish a directory of contact details for members of our church family, thus allowing people to make contact with one another directly. Access to such contact details may be limited should the Data Subjects so wish. Once such information is published we are unable to control the distribution.
- ✚ Our processing also includes the use of CCTV systems for the prevention and prosecution of crime.



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8. Where we store your personal data

The majority of data that we hold locally is stored electronically, either on our Church management system (currently ChurchSuite, our primary Data Processor), on church computers and/or similar devices. Where it is necessary for church staff and volunteers to process data away from the Church premises, data is held on personal computers and/or similar devices. Where it is necessary and appropriate some personal data is kept in hard-copy format.

Church devices used to hold and process electronic data are password protected, backed-up and secured using anti-virus software. Hard-copies of data are held within lockable storage units on our Data Controllers premises.

It is acknowledged that we are unable to ensure that personal data held by church staff and volunteers on their own personal devices, and in pursuance of their designated church roles comply, fully with data legislation. However, we do request and expect such persons to comply with the DPA and GDPR.

Data that we hold on ChurchSuite is processed and stored using high levels of security and protection, and backed up remotely, all in accordance with the ChurchSuite Privacy Policy.

9. The legal basis for our processing your personal data

Much of the data we process is necessary for our legitimate interests, or the legitimate interests of a third party (such as another organisation within the Church of England). An example of this would be our safeguarding work to protect children and adults at risk. We will always take into account 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.

We will also process your data in order to assist you in fulfilling your role in the church including pastoral and administrative support or if processing is necessary for compliance with a legal obligation.

Religious organisations 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.



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10. Sharing your personal data

Your personal data will be treated as strictly confidential and will only be shared with members of the Church in order to carry out a service or for purposes connected with the Church. It will only be shared with third parties, including other Data Controllers, where it is necessary for the performance of the Data Controllers' tasks or where you give us prior consent. It is likely that we will need to share your data with:

- ✠ Other clergy or lay persons nominated or licensed by the bishops of the Diocese of Southwark to support the mission of the Church in our parish. Assistant or temporary ministers, including curates, deacons, licensed lay ministers, commissioned lay ministers or persons with Bishop's Permissions.
- ✠ We may need to pass on information if required by law or by a regulatory body. For example, a Gift Aid audit by the HMRC, or if asked for details by a law enforcement agency.
- ✠ We do not sell or pass any of your personal information to any other organisations and/or individuals without your express consent, with the following exception – by providing us with your details you are giving the church your express permission to transfer your data to our service providers including mailing houses, such as ChurchSuite, to enable fulfilment of the purpose for collection.

Where such details are shared we have confidentiality agreements in place that restrict the use of your information to the purpose for which it is provided and ensure it is stored securely and kept no longer than necessary. We may employ agents to carry out tasks on our behalf, such as processing donations. These agents will be bound by contract to protect your data and we remain responsible for their actions. We may provide third parties with general information about users of our website, but this information is both aggregate and anonymous. However, we may use IP address information to identify a user if we feel that there are or may be safety and/or security issues or to comply with legal requirements.

- ✠ Our agents, servants and contractors. For example, we may ask a commercial provider to send out newsletters on our behalf, or to maintain our church management system / database software

11. The length of time we retain 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 of time. For example, it is current best practice to keep financial records for a minimum period of 7 years. 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.

12. Children

Families making use of the children's facilities during our services are required to provide personal data for their children. This data is provided with the consent of the parent or guardian and is securely held and stored as above. We require parental consent for any child under the age of 18.



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13. Your rights and your personal data

You have a number of rights with respect to your personal data and these are outlined below. 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. Some of these rights may be managed directly by you by using our on-line church management system, ChurchSuite for which access details may be obtained through the church office (details below).

- i. The right to access information we hold on you
 - a. 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.
 - b. There are no fees or charges for the first request but additional requests for the same data may be subject to an administrative fee.
- ii. The right to correct and update the information we hold on you
 - a. If the data we hold on you is out of date, incomplete or incorrect, you may inform us with the details and your data will be updated.
- iii. The right to have your information erased
 - a. 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.
 - b. 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)).
- iv. The right to object to processing of your data
 - a. 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.
- v. The right to data portability
 - a. You have the right to request that we transfer some of your data to another Controller. We will comply with your request, where it is feasible to do so, within one month of receiving your request.
- vi. The right to withdraw your consent to the processing at any time for any processing of data to which consent was sought.
 - a. You can withdraw your consent in person, by telephone, email or by post (see Contact Details below).
- vii. The right to object to the processing of personal data where applicable.
- viii. The right to lodge a complaint with the Information Commissioner's Office (ICO).



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14. Transfer of Data Abroad

We use cloud-based systems to process data and therefore data may be processed outside of the European Economic Area (EEA). Our website is also accessible from overseas so on occasion some personal data may be accessed from overseas.

We adopt the ICO approved measures and therefore ensure that personal data is held in compliance with European data protection regulations. We take all reasonable steps to ensure that your data is stored and processed securely in accordance with this policy. By submitting your personal data you agree to this transfer, storing and processing of your information.

15. Further processing

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

16. Changes to this notice

We keep this Privacy Notice under regular review. Whenever we update it this will be made readily available to you via the Church website www.goodshepherdcarshalton.org, in hardcopy format or by one of your consented method of communication.

This Notice was last updated: **December 2018.**

17. 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 at:

To: The Data Controller

Postal Address: The Church of the Good Shepherd,
Queen Mary's Avenue,
Carshalton Beeches,
Surrey SM5 4NP

Email: officegoodshepherd@btinternet.com

Office Tel: 020 8643 0411

Charity Number: 11232301

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.