

Guild Church of St Margaret Pattens & St Gabriel Fenchurch

PROFORMA PRIVACY NOTICE TO MEMBERS OF THE CONGREGATION AND OTHERS

OVERVIEW

Our Intent. We are committed to safeguarding the privacy of members of the congregation, choir and others. The Guild Church of St Margaret Pattens & St Gabriel Fenchurch (“the Church”) will only use the information that we collect about you lawfully and in accordance with the Data Protection Act 1998 (the “Act”).

Changes to Data Protection Legislation. Data Protection legislation and the Act is currently going through a period of change. The introduction of the European Union’s General Data Protection Regulation (GDPR) and the new British Data Protection Bill that will replace the Act and is currently passing through Parliament is the basis of this change. This Privacy Notice is therefore intended to comply with the Act and GDPR but may change over time.

Members of the Congregation, Choir and Other Terms & Conditions. This Privacy Notice, forms part of Terms & Conditions for being a member of the Church. In legal terms, members are “Data Subjects,” i.e. “you.” However, we may also under this collect personal information regarding your spouse and dependents if appropriate.

The Data Controller. The Church is from a legal perspective classed as the ‘Data Controller.’

Data Protection Officer (DPO) The Church is not required to appoint a *Data Protection Officer*. The responsibility for this policy rests with the Guild Church Council and is maintained and administered by the Administrator as the Data Processor.

The formal mechanism for members to raise concerns regarding the processing of personal data is primarily to contact the Administrator by email to info@stmargaretpattens.org in writing to the church at its address: Rood Lane, Eastcheap. London EC3M 1HS

DATA COLLECTION AND PROCESSING

Purpose of Processing Personal Data. We collect personal data primarily for membership management, Church administration, financial management, to support and advance the objectives of Church of England.

Lawful Basis of Processing Personal Data. The lawful basis of processing your personal data are as follows:

Consent. Once you have agreed to this Privacy Notice of our Terms & Conditions, by completing and returning the relevant form to the Administrator, you will be registered for the processing of your personal data, based upon your Consent.

Categories of Personal Data Processed. The information we hold should be accurate and up-to-date. The personal information which we hold will be held securely in accordance with our internal data protection and security policies. The type or categories of personal data we will collect about you, and their use, are as follows:

What information may be collected?	<p>Full Name, address, telephone and email contacts, date of birth, personal details, professional experience, as they relate to Church's activities.</p> <p>Financial details for Gift Aid purposes</p>
Sensitive Personal Data.	We will never collect sensitive personal data about you without your explicit consent and a clear explanation as to why it is required.
Spouse Personal Data.	If we hold personal data about a member's spouse, we will ask for consent from the spouse for this.
Photographs	Photographs may be taken of members of the congregation and their guests at events, some of which may be published in the Church website and other social media.
Who is collecting it?	The Administrator
How is it collected?	Application for inclusion of the Electoral Roll, Event bookings, Gift Aid envelopes.
Why is it being collected?	To process applications, to register with the Diocese of London as appropriate, establish accurate event arrangements, to learn of members' interests and aspirations; to enable Gift Aid tax reclaims.
How will it be used?	Maintain a database, generate address labels and letters, to notify events etc. Equally minutes of meetings and records of decisions may include your name and other information about you.
Who will it be shared with?	<p>Within the GCC and Committees. Financial details with the Treasurer and the book keeper.</p> <p>We will not sell or pass your personal data to any other commercial or charitable organisation.</p>
Identity and contact details of any data controllers	<p>The Administrator is the sole administrator, and may be contacted by telephone to 020-7623 6630; by email to info@stmargaretpattens.org by post to St Margaret Pattens Church, Rood Lane, Eastcheap, London EC3M 1HS</p> <p>The Treasurer and book keeper monitor receipts from and payments to members and may be contacted via the Administrator</p>
Details of transfers outside the EEA and safeguards	Personal data will only be transferred outside the EEA or other areas of adequacy determined by the EU, for specific events. If this is required, consent will be explicitly requested from you.

Retention period

Names, contact details and relevant Church admission, resignation and death dates are maintained in the database and in secure archive storage as a historical record of the Church's members.

DATA SUBJECT RIGHTS

Under the Act and in even more so under the GDPR you have a number of Rights which we have outlined below:

Right of Access. You are entitled to access your personal data so that you are aware of and can verify the lawfulness of the processing. This is achieved through the mechanism of a Subject Access Request (SAR) and you have the right to obtain:

- Confirmation that your data is being processed (held)
- Access to your personal data (a copy) and
- Other supplementary information that corresponds to the information in this privacy notice.
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Fees and Timings. Under GDPR and from 25 May 2018, this information will be provided without charge; without delay and within one month. If an extension is required or requests are considered manifestly unfounded or excessive, the Church may choose to charge a reasonable fee taking into account the administrative costs of providing the information; or refuse to respond. The reasons for this will be formally notified to you and your rights to appeal to the appropriate Supervisory Authority, i.e. UK Information Commissioner's Office (ICO) will be highlighted.

Identity Verification. To protect your personal data, the Church will seek to verify your identity before releasing any information to you. As a member this will normally be a simple process, however if the SAR is made from a member living overseas, or former member, or by the relative of a deceased member, then additional verification steps are likely.

Right of Rectification. You are entitled to have personal data rectified if it is inaccurate or incomplete, and members have a responsibility either to amend basic contact details in the online members' directory themselves, or to inform the Administrator of the necessary corrections to be made. The Church will respond within one month of your request. In the unlikely event that action to the request for rectification is not taken, we will inform you of your rights to complain or seek judicial remedy.

Right of Erasure. You may request the deletion or removal of personal data where there is no compelling reason for its continued processing. The Right to Erasure does not provide an absolute '*right to be forgotten*'. However, you do have a right to have personal data erased and to prevent processing in specific circumstances:

- Where the personal data is no longer necessary in relation to the purpose for which it was originally collected/processed
- When you withdraw consent
- When you object to the processing and there is no overriding legitimate interest for continuing the processing
- The personal data was unlawfully processed
- The personal data has to be erased in order to comply with a legal obligation

Right to Restrict Processing. Under the Act, you have a right to *'block'* or suppress processing of personal data. The restriction of processing under the GDPR is similar. When processing is restricted, the Church is permitted to store the personal data, but not further process it. In this event exactly what is held and why will be explained to you.

Right to Data Portability. You may request to obtain and reuse your personal data for your own purposes across different services. This allows you to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way, without hindrance to usability. The Right to Data Portability only applies:

- To personal data you have provided to the Church
- Where the processing is based on your consent or for the performance of a contract and
- When processing is carried out by automated means.

^In these circumstances the Church will provide a copy of your data free of charge, without undue delay and within one month. If there is a delay to this, you will be informed.

Right to Object. You have the right to object to:

- Processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling)
- Direct marketing (including profiling) and
- Processing for purposes of scientific/historical research and statistics.
- The Church does not participate in any of these activities where individual personal data would be involved.

Automated Decision Making and Profiling. The Church does not employ any automated decision-making or conduct profiling of Data Subjects. However, if you have consented to be held on our database we may periodically send you information so that you are informed of upcoming events and items of interest. These will be automated but they do not involve automated decision-making or profiling.