

CENTRAL CHURCH WARRINGTON

DATA PRIVACY NOTICE

The following policy was agreed at the Trustees Meeting held of 30 March 2022

Overview

Central Church Warrington is committed to looking after your data in line with the high standards of the law. We will not sell or rent your information to anyone else. We will keep our records of your data accurate, we will store them with appropriate security, and we will not collect or hold any unnecessary data, nor for longer than it is needed.

Your personal data - what is it?

“Personal data” 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).

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 processing of personal data is governed by the Data Protection Regulation 2016/679 (the “GDPR”); and other legislation relating to personal data and rights such as the Human Rights Act 1998.

Who are we?

The charity trustees of Central Church Warrington are the data controllers (contact details below). This means it decides how your personal data is processed and for what purposes.

What data do we process?

We will process some or all of the following where necessary to perform our tasks:

- Names, titles, and aliases, photographs;
- Contact details such as telephone numbers, addresses, and email addresses;
- 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, languages spoken, education/work histories, meetings/group attendance, academic/professional qualifications, hobbies, family composition, and dependants;
- Where you make donations or pay for activities such as use of the building, financial identifiers such as payment details, policy numbers, and claim numbers; and
- 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 (as defined here by the ICO <https://goo.gl/rHo6Zt>) where it is required by statute.

How do we process your personal data?

The data controllers 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 and disclosure and to ensure that appropriate technical measures are in place to protect personal data.

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

- To enable us to meet all legal and statutory obligations (which includes the CIO complying with its obligations under the General Regulations in relation to the keeping of, and provision of access to, registers of its members and charity trustees);

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- To carry out 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;
- To minister to you and provide you with pastoral and spiritual care (such as visiting you when you are gravely ill or bereaved) and to organise and perform ecclesiastical services for you, such as baptisms, confirmations and funerals;
- To deliver the Church's mission to Warrington, and to carry out any other voluntary activities for the benefit of the public,
- To fundraise and promote the interests of the Church and charity;
- To maintain our own accounts and records;
- To process a donation that you have made (including Gift Aid information);
- To seek your views or comments;
- To notify you of changes to our services, events and role holders;
- To send you communications which you have requested and that may be of interest to you. These may include information about campaigns, appeals, other fundraising activities;
- To process a grant or application for a role;
- To manage our employees and volunteers;
- To enable us to provide a voluntary service for the benefit of the public in Warrington.

What is the legal basis for processing your personal data?

Most of our data is processed because it is necessary for our legitimate interests, or the legitimate interest of a third party (such as another organisation in 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 interest, rights and freedoms. Some of our processing is necessary for compliance with a legal obligation. For example, the CIO must comply with its obligations under the General Regulations in relation to the keeping of, and provision of access to, registers of its members and charity trustees. 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.

Religious organisations are also permitted to process information about your religious beliefs to administer membership of 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.

Sharing your personal data

Your personal data will be treated as strictly confidential. It will only be shared with other members of the church, for purposes connected with the church. It will only be shared with third parties where it is necessary for the performance of our tasks or 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):

- The appropriate bodies of the Church of England

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- Our agents, servants and contractors. For example, we may use a commercial provider to send our newsletters on our behalf (e.g. MailChimp). Or to maintain our database software (e.g. Google Drive, Dropbox).
- Other clergy or lay persons nominated or licensed by the bishops to support the mission of the Church in Warrington. For example, our clergy are supported by our area dean and archdeacon, who may provide confidential mentoring and pastoral support. Assistant or temporary ministers, including curates, deacons, licensed lay ministers, commissioned lay ministers or person with Bishop's Permissions may participate in our mission in support of our regular clergy;
- On occasion, other churches (including para-church organisations) with whom we are carrying our joint events or activities.

How long do we keep your personal data?

In general, we will endeavour to keep data only for as long as we need it, in accordance with the Church of England's policies and if we are legally required to do so. This may mean we have to keep some of your records for an extended period of time. For instance:

- Safeguarding records are legally required to be held for 50 years.
- It is current best practice to keep financial records for a minimum period of 7 years to support HMRC audits.
- We may in due course retain registers relating to baptisms and funerals, which will be held permanently.

Notwithstanding this, we will look to delete data when it is no longer needed.

Your rights and your personal data

Unless subject to an exemption under the GDPR, 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.

1. The right to access information we hold on you.
 - 1.1. 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.
 - 1.2. There are no fees or charges for the first request unless the request is 'manifestly unfounded or excessive' but additional requests for the same data may be subject to a reasonable administrative fee.
2. The right to correct and update the information we hold on you.
 - 2.1. If the data we hold on you is out of date, incomplete or incorrect, you can inform us and your data will be updated.
3. The right to have your information erased.
 - 3.1. 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.

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- 3.2. 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)).
4. The right to object to the processing of your data.
 - 4.1. 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.
5. The right to data portability.
 - 5.1. 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.
6. The right to withdraw your consent to the processing at any time for any processing of data to which consent was sought.
 - 6.1. You can withdraw your consent easily by telephone, email, or by post (see Contact Details below).
7. The right to object to the processing of personal data where applicable.
8. The right to lodge a complaint with the Information Commissioner's Office.

Transfer of Data Abroad

Our website is accessible from overseas so on occasion some personal data (for example, a photo or a newsletter) may be accessed from overseas.

Further processing

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

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 complains at:

The Data Protection Lead, Central Church Warrington, 60 Green Lane, Warrington, England, WA1 4JG.

Email: centralchurchwarrington@gmail.com

You can contact the Information Commissioner's 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.