

## General Privacy Notice

### 1. Your personal data – what is it?

Personal Data is any information relating to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information that the data controller may possess or be likely to obtain. The processing of personal data is governed by the UK General Data Protection Regulation (UK GDPR) brought into force by the Data Protection Act 2018 and the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019.

### 2. Who are we?

This Privacy Notice is provided to you by the PCC of St Paul's Kingston. The PCC works closely with the incumbent, Rev Adam Rylett, and the staff team of St Paul's Kingston and has appointed the Operations Manager (currently Caroline Dennis) as the Data Protection Officer and Data Controller for the purposes of the Data Protection Act. The PCC and staff team work together to decide how your personal data is processed and for what purposes and are collectively responsible to you for how we process your data.

### 3. What data do the data controllers listed above 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, or where you provide them, we may process demographic information such as gender, age, date of birth, marital status, nationality, education/work histories, qualifications, hobbies, family composition, and dependants;
- Where you make donations or pay for activities, financial identifiers such as bank account numbers, payment card numbers, payment/transaction identifiers, policy numbers, and claim numbers;
- 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.

### 4. How do we process your personal data and what is the legal basis of processing your data?

We recognise the importance of the correct and lawful treatment of personal data and we will not share your information with others without your consent. All personal data, whether it is held on paper, on computer or other media, will be subject to the appropriate legal safeguards to comply with our legal obligation 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; 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.

Most of our data is processed because it is necessary for our legitimate interests, or the legitimate interests of a third party (such as another organisation in the Church of England). For example, our safeguarding work to protect children and adults at risk. We will always take into account your interests, rights and freedoms.

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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. For example, processing your data in connection with the hire of church facilities.

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.

We use your personal data for some or all of the below purposes.

- To send communications which you have requested and that may be of interest to you, to seek your views or comments or to notify you of changes to our services or events;
- To process photos taken of you, with your consent, which we may use to publicise our activities;
- 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);
- To carry out comprehensive safeguarding procedures (including due diligence and complaints handling) in accordance with best safeguarding practices;
- 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, weddings and funerals;
- To administer the parish, deanery, archdeaconry and diocesan membership records;
- To maintain our own accounts and records, and to process a donation that you have made (including Gift Aid information);
- To manage our volunteers;
- To manage the hire of our building, contact information and payment information will be kept.
- To share contact details with other church members in our online address book managed by ChurchSuite (note, you can set what details are visible to others).

### 5. Sharing your personal data

Your personal data will be treated as strictly confidential. It will only be shared with third parties where it is necessary for the performance of our tasks or where you 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 members of the congregation to carry out a service. For example, sharing contact details on a rota to enable swapping of duties;
- Our agents, servants and contractors. For example, to process our DBS checks and maintenance of our database software (ChurchSuite);
- As a member of the PCC, church warden, PCC secretary and deanery synod representative your contact details will be shared with the Diocese of Southwark and or the Charity Commission.
- In accordance with our Diocesan Safeguarding Policy "A Safe Church" personal data relating to safeguarding may be shared confidentially between the Parish Safeguarding Officer and the Diocesan Safeguarding team. <http://southwark.anglican.org/safeguarding/diocesan-policies-and-procedures>

## 6. How long do we keep your personal data?

We keep data in accordance with the guidance set out in the guide *Save or Delete: the Care of Parish Records* which is available here: <https://www.churchofengland.org/more/libraries-and-archives/records-management-guides>. We will only keep data for as long as we need it, however we may keep some records permanently if we are required to do so. Where we no longer need to process your personal data for the purposes set out in this Privacy Notice, we will delete your personal data from our systems.

Specifically, we retain electoral roll data while it is still current; gift aid declarations and associated paperwork for up to 6 years after the calendar year to which they relate; and parish registers (baptisms, marriages, funerals) permanently.

## 7. Your rights and your personal data

Those whose personal information is held by St Paul's Kingston have the right to access any such data whether it is kept electronically or on paper. This right is subject to certain exemptions, for instance if it relates to another individual. Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of your personal data which St Paul's Kingston holds about you;
- The right to request that St Paul's Kingston corrects any personal data if it is found to be inaccurate or out of date, note church members can correct this themselves via My ChurchSuite;
- The right to request your personal data is erased where it is no longer necessary for St Paul's Kingston to retain such data. In the case that you request that we erase the data we hold, we will confirm whether the data has been deleted or the reason why it cannot be deleted (e.g. because we need it for our legitimate interests or a regulatory purpose).
- The right to object to processing of your data.
- The right to data portability.
- The right to withdraw your consent to the processing at any time for any processing of data to which consent was sought.
- The right to object to the processing of personal data where applicable.
- The right to lodge a complaint with the Information Commissioner's Office.

To exercise your rights, please send your request to us in writing (see contact details below). When exercising your rights, 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.

## 8. Church Database Information – ChurchSuite and My ChurchSuite

St Paul's Kingston uses ChurchSuite to manage the data we hold. ChurchSuite's Paper on GDPR and Data Protection can be found via the link <https://support.churchsuite.com/article/428-case-study-gdpr-data-protection-whitepaper>.

- Access to the database is strictly controlled through the use of name specific passwords, which are selected by the individual.
- Only St Paul's Kingston staff team have authorised access to the main database and this access is controlled by St Paul's Kingston Operations Manager (who is the Data Controller) and other specified administrators. These are the only people who can access and set these security parameters.

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- All access and activity on the database is logged and can be viewed by the Data Controller.

My ChurchSuite is the member-facing platform. Through My ChurchSuite, people can manage their personal details and those of their own children, sign-up for events, join connect groups, stay on top of the rotas they serve on, block out unavailability and organise swaps, view their church communications, and more.

### **9. Transfer of Data Abroad**

From 1st January 2021, the UK became a third country outside the European Economic Area (EEA). Any electronic personal data transferred either to countries or territories inside the European Economic Area (EEA) or to other third countries, will only be placed on systems complying with measures giving equivalent protection of personal rights either through international agreements or contracts approved by the United Kingdom. Our website is also accessible from overseas so on occasion some personal data may be accessed from overseas. We take all reasonable steps to ensure that your personal data is processed securely.

### **10. Further processing**

If we wish to use your personal data for a new purpose, not covered by this Privacy Notice, 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 and will seek your prior consent to the new processing.

### **11. Contact Details**

Please contact the Operations Manager (Caroline Dennis) 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: St Paul's Church Office, Queens Road, Kingston upon Thames, KT7 7SF; [caroline.dennis@stpaulskingston.org.uk](mailto:caroline.dennis@stpaulskingston.org.uk); or 020 8549 5444.

If you are unhappy with how your personal data has been processed, you have the right to lodge a complaint with the Information Commissioners Office at any time. You can contact the Information Commissioners Office on 0303 123 1113 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.