

DATA PRIVACY NOTICE

The Parochial Church Council (PCC) of St Matthias, Fiveways

1. Your personal data - what is it?

Personal data relates 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 in the data controller's possession or likely to come into such possession. The processing of personal data is governed by the General Data Protection Regulation (the GDPR).

2. Who are we?

The PCC of St Matthias, Fiveways is the data controller. This means it decides how your personal data is processed and for what purposes.

3. How do we process your personal data?

The PCC of St Matthias, Fiveways complies with its obligations under the GDPR by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

We use your personal data for the following purposes: -

- To enable us to provide a voluntary service for the benefit of the public;
- To provide church services, events and activities;
- To administer membership records;
- To fundraise and promote the interests of St Matthias Fiveways;
- To manage our employees, interns and volunteers;
- To maintain our own accounts and records (including the processing of gift aid applications).

4. What is the lawful basis for processing your personal data?

We rely on one or more of the following reasons in law which give us the right or the duty to process personal data:

- **Consent:** On occasion we seek explicit consent for us to process data, particularly data which is classified as sensitive. This may include processing of data regarding children, and vulnerable adults.
- **Legal obligations:** Processing is necessary for carrying out obligations under employment, social security or social protection law, or a collective agreement;
- **Legitimate interests:** Our purposes are the provision of church services, events and activities. In accordance with these, we carry out processing in our capacity as a not-for-profit body with a political, philosophical, religious or trade union aim with the provision that: -
 - the processing relates only to members or former members (or those who have regular contact with it in connection with those purposes); and
 - your interests and fundamental rights do not override those interests.
- A Legitimate Interest Assessment (balance test) has been conducted and documented.

5. Sharing your personal data

- Your personal data will be treated as strictly confidential.
- Personal data may be shared with our affiliated charities in line with our stated purposes and for internal administrative purposes.
- We use trusted organisations as third party data processors to carry out some of our administrative and financial purposes, and ensure through legally binding contracts that these organisations maintain complete confidentiality of your data and themselves comply fully with GDPR.
- We will only share your data with other third parties with your consent, or as required to comply with statutory obligations.

6. International transfers

- We generally use external third parties based within the European Economic Area (EEA) so their processing of your personal data will not involve a transfer of data outside the EEA. This includes our main database provider, ChurchSuite.
- Where we contract with external third parties with an international base, we will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. This includes Campaign Monitor (Australia).
- Where we contract with providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. This includes MailChimp.

7. How long do we keep your personal data?

In general, we will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

Specific examples illustrate this:

- **Church members:** on people involved in St Matthias while it is still current and up to 2 years after a person has ceased to be involved with all aspects of our church life;
- **Financial matters:** gift aid declarations and associated paperwork for up to 6 years after the calendar year to which they relate;
- **Parish registers:** information on baptisms, marriages and funerals permanently, as required by the Church of England.

8. Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights concerning your personal data: -

- The right to request a copy of your personal data which the PCC of St Matthias, Fiveways holds about you;
- The right to ask us to correct any personal data if it is found to be inaccurate or out of date;
- The right to ask for your personal data to be erased where it is no longer necessary for the us to retain such data;
- The right to withdraw your consent to the processing, where consent is used as a basis for such processing;
- The right to ask us to stop processing your data during any dispute about the accuracy or processing of your personal data;

- The right to lodge a complaint with the Information Commissioner's Office

9. Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Protection 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.

10. Contact Details

To exercise all relevant rights, queries or complaints, please contact the Office Manager at info@stmatthiasbrighton.org or on 01273 239580.

You may also amend your details, preferences, and invoke your right to be forgotten through your personal My ChurchSuite account.

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.

This policy applies from 25th May 2018 and was updated on 24 May 2018.