

St John The Evangelist, Kenilworth Data Protection Policy (v2.0)

1. Policy Aims

This policy covers how we will process (use and store) your data, what data we hold, your individual rights and how you can interact with us about your data.

This policy covers our use of **personal data**, which is any information about a living individual which allows them to be identified from that data (for example a name, photograph, video, email address, or postal address).

Our **processing of personal data** is governed by the **Data Protection Act 2018** and the **General Data Protection Regulation 2016 (the “GDPR”)** and other legislation relating to personal data and rights such as the **Human Rights Act 1998**.

This policy should be read in conjunction with the **Data Privacy Notice** which can be found on our website.

## How is your data used and processed?

Our staff and volunteers 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 only hold data that either we are legally obliged to or that helps us fulfil our missional and charitable aims as a church. We are a membership organisation and good communication with our membership is an essential part of being church.

## What is our legal basis for processing your personal data?

Our legal basis is as follows:

* Most of our data is processed because it is necessary for our legitimate interests to enable our charitable and missional aims. For example, maintaining membership records, safeguarding children and adults at risk of abuse, recording our financial donations, and operating team rotas for the effective function of Sunday services or other groups.
* Some of our processing is necessary for compliance with a legal obligation. Retaining safeguarding records and gift aid declarations are examples of this.
* We may also process data if it is necessary for the performance of a contract with you, or to provide a direct service to you, for example, if you buy tickets for a church event.
* As a religious organisation, we are permitted to process information about your religious beliefs to administer our membership.

Where your information is used other than in accordance with one of these legal bases, we will first obtain your consent to that use. For example, if you are a regular attender and request to receive our weekly news.

## How long will we keep your personal data?

Our general rule is to keep data no longer than necessary. Where you continue to actively engage with our church services, activities and events, we will retain the appropriate data for you so that we can best serve your involvement. We operate an annual process of review, by which we assess who is actively engaging in church life, and where this is not the case, we will remove your data.

Additionally:

* We will keep some records permanently if we are legally required to do so. For example, this covers wedding registers and some safeguarding records.
* We may keep some other records for an extended period. For example, it is current best practice to keep financial records for a minimum period of six years to support HMRC audits.

## What are your rights regarding your personal data?

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.

* **The right to access information we hold on you.** 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. There are no fees or charges for the first request but additional requests for the same data may be subject to an administrative fee.
* **The right to correct and update the information we hold on you.** If the data we hold about you is out of date, incomplete or incorrect, you can inform us and your data will be updated
* **The right to have your information erased.** If you feel that we should no longer be using your data, you can request that we erase the data we hold. 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 purposes).
* **The right to object to processing of your data.** 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.
* **The right to withdraw your consent to the processing at any time for any processing of data to which consent was sought.** You can withdraw your consent easily by telephone, email, or by post.

If you have any concerns about how your data is being used, please contact the PCC Secretary in the first instance. We have a governance structure in place with a member of the PCC having responsibility for Data Protection and GDPR.