

## **St John's Church Kenilworth**

### **Data Privacy Notice**

#### ***Church Members & Beneficiaries***

#### **Personal Data as defined by GDPR**

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").

The purpose of this Notice is to inform you what personal data we need to hold about you to enable us to run the church organisation and provide the wide range of ministries available at St. John's Church (Warwick Road and Knights Meadow).

#### **Our scope**

- Pastoral care spiritual & emotional support, guidance and practical help for members of the church, for people not members of the church but in contact with the church; people associated with (or who have expressed an interest in) the church and its various ministries/activities;
- People living within the parish of St John's Kenilworth and the local geography;
- Members who have moved away but still want to be considered part of the church family and/or wish to receive communication (this might include people in other countries).

#### **Our legal basis for processing your data**

##### Legitimate Interests

- To fulfil the mission of the church and enable it to function effectively;
- To facilitate the provision of pastoral care, spiritual & emotional support, guidance and practical help;
- To provide formal courses, group activities and other events consistent with the stated purposes of the church and with the notion of the church as the body of Christ and as a family united by the love of Christ.

To achieve these purposes, it is necessary to keep contact details about the people specified in ‘Our scope’ above.

### Legal Obligations

The PCC has a legal obligation to:

maintain records of giving by church members who use Gift Aid, to satisfy HMRC tax requirements;

maintain information of events recorded in the Accident Book(s), which may contain personal data;

maintain an Electoral Roll which consists of some items of personal data, under The Church Representation Rules (Church of England, 2017, Part1).

### Consent

If a beneficiary of ministry (who is not a church member) is involved in a particular group or in receipt of a particular ministry, we shall ask their consent before sharing their details with leaders of other ministries.

### **Personal Data we hold**

Data will be confined to the minimum necessary, typically comprising: name, address, phone number, email address;

In addition, data regarding children and vulnerable adults may also include details about a responsible adult (typically: name, address, contact number, email address, relationship to the subject);

We may, in some circumstances need to keep a record of health information, for Health & Safety purposes;

For people giving to the church using Gift Aid, we need to record some financial data to satisfy HMRC tax requirements. This data will be retained for 6 years.

### **Data processing**

We shall use your personal data for the following purposes:

- To enable us to provide a range of ministries for the benefit of the church family and, more widely, the public in the particular geographical area as specified in our constitution;
- To administer membership records;
- to enable the Electoral Roll to be maintained, which is required to record the names of people eligible to vote in PCC elections and to be elected to the PCC or as Churchwardens. Your name and address from the Electoral Roll update process will be entered onto the Address List to enable us to keep in contact with you.
- To raise funds;
- To manage our employees and volunteers;
- For Health & Safety and Safeguarding purposes (where necessary);
- To maintain our own accounts and records (including the processing of Gift Aid applications to meet our legal obligations);
- To inform and remind you of news, issues and services (plus events and activities relevant to church life) - this will typically be performed through the Monthly News Sheet and the Weekly Update.
- In certain pastoral situations (see below).

Note that the Incumbent, (Assistant) Curate, Retired Clergy, Non-Stipendiary Minister, Ordained Local Minister and Licensed Readers, as they will access personal data in conducting various ministries on behalf of the PCC under the Legitimate Interests set out above, are included in this notice.

Should a member of staff or volunteer (including those listed in the above paragraph) be providing pastoral support to you and consider that they need to make and keep notes of details, they will ask your permission first. This data will be kept securely, in line with PCC policies for keeping personal data, and will be deleted when it is no longer relevant. Data will not be passed on to other staff, volunteers or third parties without your express prior consent.

### **Third parties**

Information we hold may be disclosed to third parties in the following circumstances:

- To satisfy Canon Law: The Church Representation Rules (quoted above) state that “The [Electoral] Roll shall be available for inspection by *bona fide* inquirers.” In the absence of other guidance, the PCC Secretary will decide what constitutes *bona fides* in each case and may take advice from the Parish Safeguarding Officer and/or Parish GDPR Co-ordinator;
- To UK public authorities in the discharge of their lawful duties (for example, HMRC in the case of people opting to give via Gift Aid);
- To the Diocese of Coventry or the Church of England in specific circumstances.

The Church also uses Planning Center to process personal data to create rotas for some church services. Planning Center is a well-established company based in the USA, providing services and products to churches around the world. Data we input into their system is encrypted and resides on servers in the USA.

Planning Center's security policy can be found at: <https://planning.center/security/> and their approach to GDPR at: <https://support.planningcenteronline.com/hc/en-us/articles/360000477707-European-Union-Data-Privacy-Laws>

Data on the Parish Office computer is backed up to Dropbox.

Dropbox offers Europe-based storage of file blocks for qualified customers. The Dropbox infrastructure is hosted by Amazon Web Services (AWS) in Frankfurt, Germany and replicated within the Frankfurt region to ensure redundancy and protect against data loss. Metadata and Paper docs are stored in the United States for all customers.

To see the Dropbox approach to GDPR, click on this link: [https://aem.dropbox.com/cms/content/dam/dropbox/www/en-us/security/dropbox\\_gdpr\\_compliance\\_journey.pdf](https://aem.dropbox.com/cms/content/dam/dropbox/www/en-us/security/dropbox_gdpr_compliance_journey.pdf)

To see the Dropbox Security Whitepaper, click on this link: [https://open.spotify.com/user/119228500/playlist/3CltyKVgVND6XdPv6IsUMK?si=ZWIY73M6RVCqJ\\_DgVseA2g](https://open.spotify.com/user/119228500/playlist/3CltyKVgVND6XdPv6IsUMK?si=ZWIY73M6RVCqJ_DgVseA2g)

To see the Dropbox Privacy Paper, click on this link: <https://www.dropbox.com/privacy>

We shall not disclose your personal data in any other circumstances without seeking your prior consent. For example, we shall not share your data with third parties to allow them to contact you about their events or activities separately (even if these take place on church premises).

## **Security & Confidentiality**

Your personal data will be treated as strictly confidential and will only be shared with other members of the church in order to carry out ministries for you, for other church members, other people defined in 'Our scope' above or for other purposes connected with the church. Printed data is kept securely in the church office. Electronic data is kept securely on a password protected computer.

## **Special Category data**

The processing of personal data in relation to the application for enrolment on the Electoral Roll requires, under The Church Representation Rules (Church of England, 2017, Part1), that a person necessarily reveals his/her religious belief, which is classified as sensitive (“special category”) personal data under GDPR.

As mentioned above, we may, in some circumstances need to keep a record of health information, for Health & Safety purposes (e.g. in the case of children and vulnerable adults).

We may record additional data for Safeguarding Purposes if required to by the relevant Safeguarding authorities.

## **Retention of your data**

We shall keep data in accordance with the guidance set out in the guide “Keep or Bin: Care of Your Parish Records” which is available from the Church of England website at: - <https://www.churchofengland.org/more/libraries-and-archives/records-management-guides>

## **Your rights**

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 the PCC holds about you;
- The right to request that the PCC corrects any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary for the PCC to retain such data;
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing until the dispute is resolved;
- The right to lodge a complaint with the Information Commissioners Office if you are not satisfied with the response you receive from the PCC.

## **Whom to contact**

To exercise all relevant rights, queries or complaints please in the first instance contact the PCC Secretary ([pcc@stjohn316.co.uk](mailto:pcc@stjohn316.co.uk)).

If your query or complaint cannot be satisfactorily handled, 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.

## **Changes to this Data Privacy Notice**

If it becomes necessary to use your personal data for a new purpose, not covered by this Data Privacy 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.

*Data Privacy Notice - Members  
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