



*The following Data Privacy Policy and Data Privacy Notice were agreed at the Parochial Church Council (PCC) held on 19 March 2024.*

## **Data Privacy Policy**

**For use by the Parochial Church Council (hereafter referred to 'The PCC') of the Parish of St Peter & St Paul, Great Missenden, with Ballinger and Little Hampden.**

### **Introduction**

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").

Religious data is deemed to be sensitive data by the GDPR. As all the data we hold can be seen to be indicative of religious belief, even when this data is not actually stored, we treat all the data we hold as though it were sensitive.

### **Storage and Security**

Personal data is held digitally by church officers, employees and designated church volunteers and is also held in paper format.

The church office will maintain an up-to-date record of where data is located, and who has access to it. This is known as the data audit.

Where data is stored electronically, it is to be stored with suitable security measures in place. People with access to the database sign up to these procedures.

Where data is stored in paper form, it will be kept under lock and key when not in use. Individuals do not freely make additional copies of the data e.g. for use at home.

As the church carries out its legitimate interests we may share some information as set out in our privacy notice.

Volunteers who have access to our data are: briefed about the requirements of the GDPR in relation to the data they access and/or hold; advised to store as much information as possible in the parish office; asked to forward data to their successor or return to the church office or destroy the data when they finish their voluntary role.

## **Data Subject Requests**

1. A subject may request a copy of all data we hold about them
2. They can do this by writing to the Vicar, c/o The Oldham Hall, Church Street, Great Missenden, HP16 0AZ giving their name and address.
3. We will inform the Diocesan Secretary and the Diocesan Registrar whenever we receive a Subject Access Request.
4. We will respond within thirty calendar days listing the data we hold about them in each of the places identified by the data audit or stating that we do not hold any information about them.
5. To do this we may have to contact the people identified by the data audit who are holding data on behalf of the Vicar and the PCC.

## **Data Correction**

- 1 On being notified of an error in the data we will correct data in all the records we identify from the data audit and report to the data subject that the data is corrected.

## **Right to be forgotten**

1. A data subject may request that we delete all the data we hold about them.
2. They can do this by writing to the Vicar, c/o The Oldham Hall, Church Street, Great Missenden, HP16 0AZ giving their name and address.
3. We will inform the Diocesan Secretary and the Diocesan Registrar whenever we receive a data deletion request.
4. We will respond within thirty calendar days confirming that they have been deleted from our records except where we have a legal obligation to retain their information.
5. To do this we may have to contact the people identified by the data audit who are holding data on behalf of the Rector and the PCC.

## **Breach**

If a data breach is identified, we will

1. Notify the Diocesan Secretary, the Diocesan Registrar and, if advised by them the Information Commissioner
2. Analyse severity and impact
3. Contact people whose data may have been accessed
4. Review policies, procedures and training

## 5. Report to PCC

### **Data Privacy Notice**

#### **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").

Religious data is deemed to be sensitive data by the GDPR. As all the data we hold could be seen to be indicative of religious belief, even when this data is not actually stored, we treat all the data we hold as though it were sensitive.

#### **2. Who are we?**

The PCC and the Vicar are both data controllers. The PCC and the Incumbent follow the same policies and procedures on how your personal data is processed and for what purposes.

#### **3. How do we process your personal data?**

The PCC and the Vicar comply with their 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 in our parish;
- To enable us to carry out our ministry activities including baptisms, weddings, funerals and churchyard use;
- To provide pastoral care to parishioners and recipients of occasional offices;
- To manage our clergy, employees, self-employed staff and volunteers;
- To manage potential clergy, employees, self-employed staff and volunteers following application to be considered for a post or role;
- To administer church membership records;
- To enable our teams to operate and liaise with each other;

- To maintain our own accounts and records (including the processing of gift aid applications);
- To fundraise and promote the interests of the church;
- To share information of news, events, activities and services running at St Peter & St Paul, Great Missenden, with Ballinger and Little Hampden.

#### **4. What is the legal basis for processing your personal data?**

- Explicit consent of the data subject so that we can keep you informed about news, events, activities and services;
- Processing is necessary for carrying out legal obligations in relation to Gift Aid or under employment, social security or social protection law, or a collective agreement;
- Processing is carried out by our church where a contract is in place. Types of contracts may include providing an occasional office or booking church facilities. Data may be shared within the organisation to deliver this contract;
- Processing is carried out by our church with a religious aim provided:
  - the processing relates only to members or former members (or those who have regular contact with it in connection with those purposes, such as having received an occasional office); and
  - there is no disclosure to a third party without consent.

#### **5. Sharing your personal data**

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 a service to other church members or for purposes connected with the church. eg. If you have volunteered for a role within the church we will share your information with the person who co-ordinates this activity.

When a person ceases to perform a role for the church where they needed access to personal data we ask them to pass that data onto their successor and delete any information that they are no longer entitled to.

Where you have entered into a contract with us, i.e. asked us to perform an occasional office, we will share your data with volunteers in the church and third parties who are needed to deliver this service to you.

Where we have a legal obligation to share your information, such as processing gift aid declarations or complying with safeguarding regulations, we will not be seeking your consent.

Unless we have a legal obligation or a contractual reason we do not share data with third parties.

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

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.

Records relating to the occasional offices are kept in order for us to provide consistent pastoral care when the data subject next contacts us. We do not use these records to contact people without their consent.

Other data is kept 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.

## **7. 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:

- The right to request a copy of your personal data which we hold about you;
- The right to request that we correct 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 us to retain such data;
- The right to withdraw your consent to the processing at any time;
- The right to request that the data controller provide the data subject with his/her personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable) [Only applies where the processing is based on consent or is necessary for the performance of a contract with the data subject and in either case the data controller processes the data by automated means];
- 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;
- The right to object to the processing of personal data, (where applicable) [Only applies where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics];
- The right to lodge a complaint with the Information Commissioners Office.

## **8. 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.

## **9. Contact Details**

To exercise all relevant rights, queries or complaints please in the first instance contact the Parish Administrator at c/o The Oldham Hall, Church Street, Great Missenden, HP16 0AZ.

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.

Issued: June 2018