

The Parochial Church Council (PCC) of St Philip & St James, Odd Down Data Privacy Notice

This Privacy Notice is provided by the PCC of St Philip & St James, Odd Down to explain what to expect when we collect and process your personal data in accordance with the UK General Data Protection Regulation (GDPR). Personal data means any information about an individual from which that person can be identified.

Commented [MM1]: The UK GDPR incorporates the Data Protection Act.

The law requires us to:

- process your data in a lawful, fair and transparent way;
- only collect data for explicit and legitimate purposes;
- only collect data that is relevant, and limited to the purposes we have told you about;
- ensure that your data is accurate and up to date;
- ensure that your data is only kept as long as necessary for the purpose(s) we have told you about;
- ensure that appropriate security measures are used to protect your data.

Data Controller

The data controller is: St Philip & St James Church PCC (referred to as the PCC in the rest of this document)
Address: 35 Frome Road, Odd Down, Bath, BA2 2QF
Email: office@stphilipstjames.org
Telephone: 01225 835228
Website: www.stphilipstjames.org

1. Why we collect and use your personal data

You may provide us with personal information when you fill in a Connect Card, sign up for any of our events or courses, register a child or young person with us, support us financially or apply for a paid or volunteer position with the church.

We use your personal data for the following purposes:

- to manage, administer and promote the life of the church;
- to facilitate the inclusion of your contact details in the church directory, according to the permissions you have provided;
- to manage, maintain and publish the electoral role in accordance with Church Representation Rules;
- to administer our courses and events;
- to manage our volunteer teams;
- to determine your suitability to volunteer for our work with vulnerable adults, children and youth and to administer safeguarding checks as required by the Diocese of Bath & Wells;
- to administer financial transactions and donations (including the processing of gift aid applications);
- to manage our website and social media accounts;
- where we need to comply with a legal or regulatory obligation.

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal data without your knowledge or consent, where this is required or permitted by law.

2. The categories of personal data we collect

We may collect, use, store and transfer different kinds of personal data about you as follows:

- title, name, gender, age, date of birth, address and contact details;

- familial relationships, marital status, emergency contact details and next of kin;
- financial data, such as bank account details;
- safeguarding records and reports;
- visual images - photographs, video, live streaming;
- your communication preferences.

As a church, we collect data about services and events you attend. Some of this information may be considered to come within the definition of **Special Categories of Personal Data**. Special Categories of Personal Data include details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health (such as dietary requirements) and genetic and biometric data. We will always make it clear to you when we collect this information and why.

Please note that if you make an online purchase or donation, your card information is not held by us. It is collected by our third party payment processors, who specialise in the secure online capture and processing of credit/debit card transactions.

3. The lawful basis for processing your personal data

We use your personal data to coordinate church activities and to keep you informed of things happening in the life of the church, but we will only use your personal data when the law allows us and where it is necessary to do so for our legitimate interests as a not-for-profit body.

Our lawful bases for processing your personal data under Article 6 of the UK GDPR are as follows:

Consent: where you have provided your data for a specific purpose, such as signing up for an event or sharing your details with the church membership. We will only send direct marketing communications to you via email with your consent. You have the right to withdraw consent to marketing at any time by clicking on an unsubscribe link in one of our emails or by contacting office@stphilipstjames.org.

Legitimate Interests: where processing is necessary for the management of our church activities. We will consider and balance any potential impact on you before we process your personal data for our legitimate interests. We will not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

Legal Obligation: where we are required to use your personal data in order to comply with a legal or regulatory obligation, such as in relation to weddings, funerals or baptisms and the Church of England's Safeguarding requirements.

Contract: where processing is necessary for a contract you have with us, such as hiring our facilities.

We are also required to identify a further condition under Article 9 of the UK GDPR in relation to the processing of Special Categories of Data. The relevant conditions are:

Explicit Consent: where you have provided this data for a specific purpose, such as catering for a church event.

Not-for-Profit Body: where we are permitted to process special categories of personal data without specific consent as long as it relates only to members or former members and provided there is no disclosure to a third party without consent.

4. Where we collect your data from

We use different methods to collect data from and about you which include:

Direct interactions: You may give us your personal data by filling in forms on our website or in paper format; or by corresponding with us by post, phone, email or otherwise.

Third parties or publicly available sources: We may receive personal data about you from various third parties, including those set out below:

- the Diocese of Bath & Wells
- funeral directors
- Thirtyone: eight (Disclosure and Barring Service check provider).

5. Sharing personal data

Your personal data will be treated as strictly confidential and will only be shared with:

- the PCC, clergy of the parish, paid staff and key volunteers, only where necessary;
- other church members via the church directory or electoral roll, only with your consent;
- the church congregation when reading banns of marriage (full names, marital status and parish of residence);
- **trusted third parties who enable us to carry out the activities listed in Section 1, including:**
 - Service providers who provide IT and system administration services, such as Churchsuite, Stripe, Mailchimp, Google and Voltex (website domain)
 - The Diocese of Bath & Wells and central institutions of the Church of England in accordance with our obligations under ecclesiastical law and in relation to safeguarding;
 - Thirtyone:eight who provide Disclosure and Barring Service checks;
 - External agencies and the police, in relation to any safeguarding concerns;
 - YouTube, who provide our livestream facilities.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. How long do we keep data?

We keep data in accordance with the guidance set out in the guide “Keep or Bin: The Care of Your Parish Records”: [Records management guides | The Church of England](#).

7. Your rights and your personal data

Unless subject to an exemption under the UK GDPR, you have the right to:

- request a copy of the personal data which the PCC holds about you;
- request that the PCC corrects any personal data if it is found to be inaccurate or out of date;
- request your personal data is erased where it is no longer necessary for the PCC to retain such data;
- withdraw your consent to the processing of your data at any time where we have obtained your consent;
- request that the PCC provide you with your personal data in a structured, commonly used and machine-readable format. Also, to transmit that data directly to another data controller (in limited circumstances);
- request a restriction is placed on further processing, where there is a dispute in relation to the accuracy or processing of your personal data;
- object to the processing of personal data (in limited circumstances);
- lodge a complaint with the Information Commissioners Office.

8. Concerns and/or complaints?

To exercise all relevant rights, or for queries or complaints please in the first instance contact the Operations Manager, Tim Conroy at office@stphilipstjames.org, 01225 835228.

You can also contact

Diocese of Bath and Wells, The Old Deanery, St Andrew's Street, Wells BA5 2UG
email: reception@bathwells.anglican.org telephone: 01749 670777

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF
email <https://ico.org.uk/global/contact-us/email/> telephone: 0303 123 1113