# DATA PROTECTION POLICY

# The Parochial Church Council (PCC) of St Mary's Church, Luton

## 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 Mary's Luton is the data controller (contact details below). 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 Mary's Luton 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data up to date; by storing and destroying it securely; by not collecting or retaining data which is incorrect or out of date; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect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 administer membership records;
- To manage our employees and volunteers;
- To maintain our own accounts and records (including the processing of gift aid applications);
- To inform you of news, events, activities and services running at St Mary's;
- Parish Records as required by the General Registrar's Office.

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

- We need your explicit consent so that we can keep you informed about news, events, activities and services.
- We process your data to carry out our legal obligations in relation to Gift Aid or under employment, social security or social protection law, or a collective agreement;
- Legitimate interest Processing is carried out by a not-for-profit body with Christian aims provided: -
  - the processing relates only to members or those who have regular contact with it in connection with those purposes (this concerns routine church management including rotas, lists of group members etc.); 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 to carry out a service to other church members or for purposes connected with the church. The church uses cloud-based church management systems to securely store and process church data, including any personal information you may provide us.

#### 6. How long do we keep your personal data<sup>1</sup>?

We keep data including employment 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 [see footnote for link].

Specifically, 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. Parish registers are archived from time to time and held at the Bedfordshire Archives and Records Service on our behalf.

#### 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 the PCC of St Mary's Luton holds about you;
- The right to request that the PCC of St Mary's Luton 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 of St Mary's Luton to retain such data;
- The right to withdraw your consent to the processing at any time
- 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 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 of complaints please in the first instance contact the Office Administrator at <u>admin@stmarysluton.org</u>, phone number: 01582 721867.

You can contact the Information Commissioners Office on 0303 123 1113 or via email <u>https://ico.org.uk/global/contact-us/email/</u> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.

<sup>&</sup>lt;sup>1</sup> Details about retention periods can currently be found in the Record Management Guides located on the Church of England website at: - <u>https://www.churchofengland.org/more/libraries-and-archives/records-management-guides</u>