

This is the privacy and data protection policy for the church. It 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). Identification can be by the information alone or in conjunction with any other information.

Our processing of personal data is governed by the Data Protection Bill/Act 2017-2019 and the General Data Protection Regulation 2016/679 (the "GDPR" and other legislation relating to personal data and rights such as the Human Rights Act 1998).

### **How is your data used and processed**

The church processes data including:

- Names, titles and aliases.
- Contact information including telephone/mobile numbers, postal/residential addresses and email addresses.
- Where there is a legitimate interest to facilitate our charitable aims and activities, or where you have provided them to us, we may process demographic information such as gender, age, date of birth, marital status, nationality and dependants.
- Where you give financially in support of the church.
- As a church (religious organisation), the data we process is likely to constitute sensitive personal data because the very fact that we process your data at all may be suggestive of your religious beliefs. Where you provide this information, we may also process other categories of sensitive personal data: mental and physical health, details of injuries, medication/treatment received, data concerning criminal records, fines and other similar judicial records.

As a Data Controller, our minister 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. If you have any concerns about how your data is being use, please speak with our Data Controller.

### **What are we doing with your 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.

Therefore, we will hold and process data to:

- Enable us to meet all legal and statutory obligations.
- Comply with and facilitate our comprehensive safeguarding procedures (including due diligence and complaints handling) in accordance with best safeguarding practice with the aim of ensuring that all children and adults at risk are provided with safe environments.
- Deliver our Church's mission to carry out any other voluntary or charitable activities for the benefit of the public as provided for in the constitution and statutory framework of our church.
- Administer our membership records.
- Enable us to follow up membership, course and event enquiries.
- Maintain our own accounts and records.
- Process and record financial donations that you have made.
- Communicate with you about our services, events, meetings, mission and other matters which are relevant to you as part of our church community.

### **What is the 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 is an example 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 should 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 'all church' emails or join a church WhatsApp Group.

### **Will we share your data?**

You can be reassured that we will treat your personal data as strictly confidential.

The main church database in the form of a church directory is only made available to the minister and trustees.

Data will only be shared with third parties where it is necessary for the performance of our tasks or where you first give us your prior consent. We may need to share your data with some or all of the following (but only where necessary):

- Our agents, servants and contractors. For example, if we should utilise a commercial provider to send out, say, newsletters.
- On occasion, other churches with which we could be carrying out joint events or activities.

Our primary database is held by our Administrator in Microsoft Word and our financial records are stored by our Treasurer in Microsoft Excel. In addition, some data is held by our Minister, our Secretary and a Sunday School Leader.

### **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 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 seven 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 or that we are illegally 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 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, mobile, email or by post.

#### The right to lodge a complaint with the Information Commissioner's Office

- 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 at Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

### Further processing

If we wish to use your personal data for a new purpose not covered by this policy, then we will provide you with a new policy prior to commencing the processing to explain this new use and set out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

### Data Controller details

Data Controller: Marlow Baptist Church

Data Protection Lead: Keith Baxter  
Email: marlowbc@yahoo.com

Senior Information Risk Owner: Heather Baxter

### Definitions and appointed persons

Role	Definition	Appointed person/organisation
Data Controller	An individual or organisation who collects, stores and processes (uses) data	Marlow Baptist Church
Data Protection Lead	The DPL is responsible for the day-to day organisational management of protection and is the go-to person for responding to any issues around data, dealing with subject access requests and completing an annual data review.	Keith Baxter
Senior Information Risk Owner	The SIRO is a trustee who works with the DPL to provide the trustees with assurance that information risk is being managed appropriately and effectively across the organisation.	Heather Baxter

Signed by the Chair of Trustees:

Date:

Review Date: