

# Brixington Community Church

## Privacy Notice

### 1. Introduction

This is the privacy notice for Brixington Community Church (BCC). 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 privacy notice covers our use of personal and sensitive data, which is any information about a living individual which allows them to be identified from that data (for example a name, photographs, videos, email address, or address). Identification can be by the information alone or in conjunction with any other information which is held by, or is likely to be held by, the Data Controller. The processing of data is governed by the General Data Protection Regulation 2016 (GDPR).

The Trustees of Brixington Community Church are the Data Controller of the church.

### 2. What data do we process?

We hold information such as name, title, address, telephone numbers and email addresses. We also have some photographs. 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, education/work histories, academic/professional qualifications, hobbies, family composition and dependants. We hold financial identifiers such as bank account details for those who make payments to the church or to whom the church makes payments. 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 which may include: racial or ethnic origin, mental and physical health, political beliefs, data concerning sexual orientation and criminal records.

The Trustees of BCC seek to 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 the appropriate technical measures are in place to protect personal data.

### 3. What do we do 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 use personal data for the following purposes:

- a) To inform individuals of news, events, activities or services running at, or being run by, BCC
- b) To provide care and pastoral support to members and those associated with the church
- c) To maintain our accounts and records, including processing Gift Aid claims
- d) To provide services to the community, including Seniors' Lunch, Coffee Morning, Parent Pop In
- e) To recruit, manage and support our employees and volunteers
- f) To safeguard children, young people and adults at risk
- g) To rent out church premises and the church manse
- h) To fundraise and promote the activities and services of the church
- i) To respond effectively to enquirers and handle any complaints
- j) To meet legal requirements, for example in relation to weddings, and to comply with Charity Commission requirements
- k) To apply for grants or other funding
- l) To maintain the security of our property and premises

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

Most of our data is processed because it is necessary for our legitimate interests as a charity and religious organisation. For example, maintaining membership records, safeguarding our children, recording our financial donations and operating team rotas of volunteers.

Some of our processing is necessary for compliance with a legal obligation. Complying with employment law and retaining safeguarding records and marriage registers are examples of this.

We may also process data if it is necessary for the performance of a contract or to provide a direct service to you.

As a religious organisation, we are permitted to process information about your religious beliefs to administer membership or contact details.

Where an individual gives consent we can use their data for other specific purposes, such as keeping non-members up to date with news and events at BCC. Consent can be withdrawn at any time by contacting the Church Office.

Almost all of the data we process has been provided directly from the individuals concerned (the data subject). If we process any information about you that has not been provided by you we will inform you of the categories of personal data and the source of the information and whether it came from publicly accessible sources. This will be done within 1 month of us receiving that data.

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

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

Examples of where it is necessary to share personal data include for employment purposes or for safeguarding issues.

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

Our general rule is to keep data no longer than is reasonably 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 will keep some records permanently if we are legally required to do so. For example this covers wedding registers and some safeguarding records. We keep financial records for at least 7 years.

We have a Document and Data Retention Schedule which provides guidelines on the review and retention of personal data. Any data no longer required will be destroyed or deleted in a secure manner.

## **7. What are your rights in respect of your personal data?**

You have some rights relating to your personal data. When exercising any of these rights, in order to process your request, we may need to verify your identity. This is for your own security. In such cases we will need you to respond with proof of your identity before you can exercise these rights. Your rights are:

- a) The right to request a copy of the personal information held about you by BCC. This should be done by contacting the Church Administrator. Once we have received your request we will normally 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.
- b) The right to correct and update the information we hold on you. If the data we hold on you is out of date, incomplete or incorrect, you can inform us and your data will be updated.
- c) 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 it cannot be deleted (for example because we need it for our legitimate interests or regulatory purpose(s)).
- d) 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.

- e) The right to data portability. You have the right to request that we transfer some of your data to another controller. We will comply with your request, where it is feasible to do so, within one month of receiving your request.
- f) The right to withdraw your consent to the processing at any time for any processing of data for which consent was sought. You can withdraw your consent easily by telephone, email, or by post (see Contact Details below).
- g) The right to lodge a complaint with the Information Commissioner's Office. You can contact the Information Commissioners Office on 03031231113 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.

## **8. Further processing**

If we wish to use your personal data for a new purpose, not covered by this 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**

If you have any queries or concerns about how we use your data, please do get in contact with the church administrator at the church office.

Brixington Community Church, Churchill Road, Exmouth, Devon EX8 4JJ (Registered Charity No. 1139968)

Tel. 01395 268720

Email: [admin@brixingtonchurch.org.uk](mailto:admin@brixingtonchurch.org.uk)

June 2018