

# Privacy Notice

## **Your personal data – what is it?**

Personal data relates to a living individual who can 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 in the data controller's possession or likely to come into such possession. The processing of personal data is governed by the Data Protection Bill/Act 2017 the General Data Protection Regulation 2016/679 (the "GDPR").

## **Who are we?**

We are Holy Trinity Cambridge (HTC). Our legal governing body is the Parochial Church Council (PCC) of the Ecclesiastical Parish of Holy Trinity Cambridge, which is a registered charity number 1128200. The PCC is the data controller and make decisions on how your personal data is processed and for what purposes. The incumbent of HTC (the Vicar) is a separate legal entity and is therefore his own data controller. The Vicar, when acting as a data controller will also works under this policy. In the rest of this Privacy Notice, we use the word "we" to refer to each data controller, as appropriate.

In order to help you to exercise your rights in relation to your data we have appointed our Operations Director, as our Data Protection Champion. You can contact the Operations Director if you have any enquiries relating to this statement or how we use information about you, including if you would like us to stop contacting you.

Details of how to contact us are at the end of this notice.

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

We comply with our 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 a Cambridge and the surrounding area;
- To co-ordinate our pastoral work;
- To administer membership and electoral roll records;
- To fundraise and promote the interests of HTC;
- 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 HTC;
- To fulfil our legal and professional obligations in relation to Health and Safety, Safeguarding, counselling, registration of marriage and other activities.

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

The process your data under the following legal basis:

- **Legitimate Interest** - Most of your personal data that we process is in accordance with our legitimate interests, or the legitimate interests<sup>1</sup> of a third party (such as another organisation in the Church of England). For example, we use your name and contact details to enable us to administer church groups, rotas and run HTC on a day-to-day basis.
- **Legal Obligation** - Some of our processing is necessary for compliance with a legal obligation. For example, we are required by the Church Representation Rules to administer and publish the electoral roll, and under Canon Law to announce forthcoming weddings by means of the publication of banns. We also have a legislative requirement, to process gift aid applications.
- **Contract** - We may also process data if it is necessary for the performance of a contract with you, or to take steps to enter into a contract. Examples of this include data we need to carry out the contracts of employment with our staff and venue hire contracts with those hiring our premises. The legal basis for holding this information is that processing is necessary for carrying out obligations under employment, social security or social protection law, or a collective agreement.
- **Consent** - Where your information is used other than in accordance with one of these legal bases, we will first obtain your consent to that use. Examples would be sending you emails to keep you up to date with news and events, or including your details within a Church Directory. After 25<sup>th</sup> May 2018 we will only contact you in this way if you have consented for us to do so by opting explicitly opting-in.

Religious organisations are also permitted to process information about your religious beliefs to administer membership or contact details.

## 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. We will only publish your name and contact details in church rotas or share your data with third parties outside of the parish with your consent.

It is likely that we will have to share your data with some or all of the following (but only when necessary):

- The appropriate bodies of the Church of England including the other data controllers;
- Our agents, servants and contractors. For example ChurchSuites who supply our church database, Sage who provide the accounting software, and CamIT who manage our server. We carefully check that they have adequate procedures in place to keep your data safe, and when it is processed outside the European Economic Area (for example in

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<sup>1</sup> Legitimate interests means that processing is carried out by a not-for-profit body with a political, philosophical, religious or trade union aim provided:

- the processing relates only to members or former members (or those who have regular contact with it in connection with those purposes); and
- there is no disclosure to a third party without consent.

the USA and New Zealand) that it is covered by agreements which ensure that the standards of data protection in the GDPR are delivered;

- Other clergy or lay persons nominated or licensed by the bishops of the Diocese of Ely to support the mission of the Church in our parish. For example, our clergy are supported by our area dean and archdeacon, who may provide confidential mentoring and pastoral support. Assistant or temporary ministers, including curates, deacons, licensed lay ministers, commissioned lay ministers or persons with Bishop's Permissions may participate in our mission in support of our regular clergy;
- Other persons or organisations operating within the Diocese of Ely;
- On occasion, other churches with which we are carrying out joint events or activities.

## How long do we keep your personal data?

We keep data in accordance with the guidance set out in the Church of England guide "Keep or Bin: Care of Your Parish Records"<sup>2</sup> and current government Disclosure and Barring Service guidance<sup>3</sup>.

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.

## 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 HTC holds about you;
- The right to request that the PCC of HTC 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 HTC to retain such data;
- The right to withdraw your consent to the processing at any time;
- The right to request that the PCC of HTC provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability)<sup>4</sup>.
- 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 your personal data, where applicable<sup>5</sup>.
- The right to lodge a complaint with the Information Commissioners Office<sup>6</sup>.

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<sup>2</sup> "[Keep or Bin...?](#)" The Care of Your Parish Records. Church of England Record Centre Records Management Guide No. 1

<sup>3</sup> [DBS checks: guidance for employers](#) and [Handling of DBS certificate information](#)

<sup>4</sup> 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.

<sup>5</sup> 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.

<sup>6</sup> You can contact the Information Commissioners Office on 0303 123 1113 or via [email](#) or at the Information Commissioner's Office, 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 Privacy 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.

## **Contact Details**

To exercise all relevant rights, queries of complaints please in the first instance contact the [Operations Director](#) at Holy Trinity Church, Market Street, Cambridge CB2 3NZ. Tel 01223 355297 [www.htcambridge.org.uk](http://www.htcambridge.org.uk).

**This policy was reviewed:** May 2018