

DATA PRIVACY NOTICE

The Parochial Church Council (PCC) of St Mary the Virgin Wivenhoe

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 Wivenhoe 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 Wivenhoe 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 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 administer membership records;
- To fundraise and promote the interests of the charity;
- To manage our employees and volunteers;
- To maintain our own accounts and records (including the processing of gift aid applications and the administration of conditional donations);
- To inform you of news, events, activities and services running at St Mary's;

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

a) For the purpose of keeping you informed about news, events, activities and services: *your consent to receive such communications; or*

We think you would reasonably expect to receive such communications: *a legitimate interest basis*. This includes i.a. invitations to past Baptism families to relevant events or contacting parents of children who attend/have attended Sunday Club events; or

To process your gift aid donations: *your consent as evidenced in the Gift Aid Declaration/section 9(2)(d) of the GDPR*.

b) As regards the Electoral Roll:

Processing for the purpose of determining eligibility, creating the electoral roll and use of the roll to calculate numbers for election to synod is necessary for compliance with a legal obligation. The processing is a statutory requirement imposed by the Church Representation Rules, which means that you must give us this information if you want to be included on the electoral roll.

Processing for the purpose of determining eligibility and creating or revising the electoral roll is carried out in the course of our legitimate activities, as this relates solely to members of the Church of England in connection with its purposes.

Processing for the purpose of publishing the electoral roll relates to personal data which are manifestly made public by the data subject. When you apply to have your name added to the church electoral roll, the automatic legal consequence as stated in the CRR, (Part I Formation of the Roll 1(8) and Revision of Roll and Preparation of New Roll 2(1), 2(3) and 2(7)) is that your name and address will be published, and by submitting your application form you are making that data public.

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 in order to carry out a service to other church members or for purposes connected with the church. We will only share your data with third parties outside of the parish as explained in the following paragraph, or where we are obliged to do so by law.

Under **4b)** above, your personal will be shared within the institutional Church of England and with the general public.

If an individual does not want his/her Electoral Roll address details to be made public, he/she can ask for his/her address details to be excluded due to specific and/or exceptional circumstances which might mean that the person might be at risk of harm if his/her address details were published. In such a case, the individual concerned should discuss his/her situation with the electoral officer or the diocesan office and it may be necessary to publish only his/her name.

6. How long do we keep your personal data¹?

We keep 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 they are still current, and for 6 years after a complete review of the electoral roll; 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.

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, Wivenhoe holds about you;
- The right to request that the PCC of St Mary’s, Wivenhoe 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, Wivenhoe to retain such data;
- The right to withdraw your consent to the processing at any time
- The right to request that the data controller provide the data subject with his/her personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable) [*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*].
- 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 Commissioner's 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

1 Details about retention periods can currently be found in the Record Management Guides located on the Church of England website at: - <https://www.churchofengland.org/about-us/structure/churchcommissioners/administration/librariesandarchives/recordsmanagementguides.aspx>

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 or complaints please in the first instance contact the PCC Secretary at wivstmarysec@gmail.com

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

10. Website

St Mary's website is hosted on Wordpress.com. To see what site visitor data are collected by Wordpress you can read WP's Privacy Policy at <https://automattic.com/privacy-notice/>

Automattic's servers are all over the world, but at present all personal and site data is stored exclusively on US based servers. Their system logs, which record information about visitors to Automattic's websites, are kept for 30 days.

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