

St Nicholas' Church,  
Nottingham  
Policy Documents



# Data Privacy Notice

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Version	Date	Author	Notes
1.0	May 2018	M Wilkinson	
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## Data Privacy Notice

**Data Controller:** Parochial Church Council of the Parish of St. Nicholas, Nottingham (Charity Reg no. 1134708), known (and referred to in this document) as St. Nic's

**Data Protection Officer:** Jon Holt

### 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 2016/679 ("GDPR") and the Data Protection Act 1998 ("DPA").

### Who are we?

This Privacy Notice is provided to you by St. Nic's (contact details below) St Nic's is the **Data Controller** for your data. This means it decides how your personal data is processed and for what purposes. St. Nic's has appointed a number of responsible people for the control and processing of personal data that we hold. These post-holders have been trained in GDPR requirements and a list of the individuals can be inspected at the Church Office by request. For clarity, these individuals undertake the processing for and on behalf St. Nic's which remains the Data Controller.

### How is your data used and processed?

St. Nic's processes personal data including names, titles, aliases, photographs, CCTV images and contact information including telephone 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, education/work histories, academic/professional qualifications, hobbies and family composition and dependents.

Where you give financially in support of St. Nic's or pay for church activities (event bookings etc.), we will also process financial identifiers such as bank account numbers, payment card details and payment transaction details.

As a church (religious organisation), the personal data we process may constitute sensitive personal data because the very fact that we process your data at all is suggestive of your religious beliefs. We may also process other categories of sensitive personal data where you provide this information: racial or ethnic origin, sex life, mental and physical health, details of injuries, medication/treatment received, political beliefs, data concerning sexual orientation and criminal records, fines and other similar judicial records.

As a Data Controller, we will comply with our legal obligations under the GDPR and the DPA 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.

If you have any concerns about how your data is being used, please speak with our Data Protection Officer.

## What are we doing with your data?

We only hold personal 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.

We use your personal data for the following purposes:

- to enable us to meet all legal and statutory obligations (which include maintaining and publishing our electoral roll in accordance with the Church Representation Rules);
- to comply with and facilitate our comprehensive safeguarding procedures (including due diligence and complaints handling) in accordance with best safeguarding practice from time to time with the aim of ensuring that all children and adults-at-risk are provided with safe environments (please see our Safeguarding Policy);
- to help you grow as a disciple and to minister to you and provide you with pastoral and spiritual care (such as visiting you when you are ill or bereaved) and to organise and perform ecclesiastical services for you, such as baptisms, confirmations, weddings and funerals;
- to deliver our Church's mission to our community, and 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 charitable organisation;
- to administer our membership, rotas, courses and events records and enable us to follow up membership, rota, course and event enquiries;
- to fundraise and promote the interests of the Church;
- to maintain our own accounts and financial records and record and process financial donations that you have made (including Gift Aid information);
- to communicate with you about your views or comments;
- to inform you of news, events, activities and services at St Nic's and update you about changes to our services, events, role holders and any matters of interest related to you or the Church community;

- to send you communications which you have requested and that may be of interest to you. These may include information about campaigns, appeals, other fundraising activities;
- to process a grant or application for a role;
- to manage our employees and volunteers;
- to enable us to provide a voluntary service for the benefit of the public in a particular geographical area as specified in our constitution; and
- for the prevention and prosecution of crime.

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

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 our children, recording our financial donations and operating team rotas for the effective function of Sunday services.

Some of our processing is necessary for compliance with a legal obligation. Retaining safeguarding records and gift aid declarations are examples of this. Also, 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 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 buy tickets for a church event. As a religious organisation, we are permitted to process information about your religious beliefs to administer membership or contact details.

Where your information is to be used other than in accordance with one of these legal bases, we will first obtain your consent to that use.

## Will we share your data?

You can be reassured 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. It is likely that we will need to share your data with some or all of the following (but only where necessary):

- Appropriate bodies within our denominational / synodical structure. All of these bodies will be part of our church setup and have their own privacy policies.
- Our contractors. For example, we utilise commercial providers to send out newsletters on our behalf, and to maintain our database software (i.e. ChurchSuite);
- On occasion, other churches with which we are carrying out joint events or activities.

Otherwise we will only share your data with third parties where you first give us your prior consent.

## How long will we keep your personal data?

We keep data no longer than is necessary. Where you continue to actively engage with our church services, activities and events, we will retain the appropriate membership data for you so that we can best serve your involvement in the life of the church. We operate to a process of review, by which we assess who is actively engaging in church membership, and where this is not the case we will remove your data. 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.

## What are your rights in regards to 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 access information we hold on you.** At any point you can contact us to request a copy of the personal data 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 on you is out of date, incomplete or incorrect, you can inform us and your data will be updated. You also have access as a church member to be able to update aspects of your personal data directly via our members portal (*My ChurchSuite* or otherwise).
- **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)).
- **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 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.
- **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, email, or by post (see Contact Details below). We will require proof of who you are, as stated above.

- **The right to lodge a complaint with the Information Commissioner's Office.** You can contact the Information Commissioners 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.

When exercising any of the rights listed below, in order to process your request, we may need to verify your identity for your security.

## Transfer of Data Abroad

Any electronic personal data transferred to countries or territories outside the EU will only be placed on systems complying with measures giving equivalent protection of personal rights either through international agreements or contracts approved by the European Union. Our website is also accessible from overseas so on occasion some personal data (for example in a newsletter) may be accessed from overseas.

## 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.

### **You are very welcome to get in contact with us...**

If you have any queries or concerns about how we use your data, please do get in contact with us.

Our Data Protection Officer is as above and can be contacted at  
Email: [operations@stnics.org](mailto:operations@stnics.org)  
Tel: 0115 9524600