



Heathcote Parish Church

Parochial Church Council (PCC) Data Protection Policy Guidance Notice

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 possession of Heathcote Parish Church (HPC) or likely to come into such possession. The processing of personal data is governed by the General Data Protection Regulation¹ (or GDPR).

2. Who are we?

In the terms of the GDPR, the parish has two data controllers – the PCC is one, (the PCC Secretary is the Data Protection Lead in the parish, contact details below) and the other is the incumbent – the Vicar of Heathcote Parish Church. This means the PCC and the incumbent decide how your personal data is processed and for what purposes.

3. How do we process your personal data?

The parish 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 may use your personal data for the following purposes:

- To enable us to provide a voluntary service for the benefit of the public in a particular geographical area as specified in our constitution; confidential data recorded in the course of the incumbent's pastoral work remains separate and within the incumbent's control;
- To inform you of news, events, activities, surveys and services running at HPC (including email distribution lists and communication within small groups);
- To administer membership records (including the electoral roll and the Church directory);
- To manage our employees and volunteers (including rota duties, safeguarding requirements and PCC members);
- To maintain our own accounts and records (including standing orders and the processing of Gift Aid applications);
- To share your contact details with the Diocesan office so they can keep you informed about news in the Diocese of Coventry and events, activities, surveys and services that will be occurring in the Diocese and in which you may be interested.

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

- We require explicit consent of your personal data so that we can keep you informed about news, events, activities, surveys and services and process your financial giving and keep you informed about Diocesan events.
- Processing is necessary for carrying out obligations under employment, social security or social protection law, or a collective agreement;
- Processing is carried out by a not-for-profit body with a religious (political, philosophical 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.

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 with your consent, however it is a necessity to share Gift Aid data with the HMRC.

6. How long do we keep your personal data?

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.²

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.

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 and the incumbent holds about you;
- The right to request that the PCC and the incumbent 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 and the incumbent to retain such data;
- The right to withdraw your consent to the processing at any time;
- 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 (contact details below).

8. Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Protection Guidance Notice, we will then 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

To exercise all relevant rights, queries of complaints please in the first instance contact the PCC Secretary at (pccsec.hpc@gmail.com) or at Heathcote Parish Church, Cressida Close, Heathcote, Warwick, CV34 6DZ.

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.

¹ The Church of England has published a more detailed guide for parishes, see: <http://www.parishresources.org.uk/wp-content/uploads/Parish-Guide-to-GDPR-updated.pdf>

² Details about retention periods can currently be found in the Record Management Guides located on the Church of England website, see <https://www.churchofengland.org/more/libraries-and-archives/records-management-guides>.