

DATA PRIVACY NOTICE

The Parish of Laughton, Ripe and Chalvington.

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"). Processing includes storing information.

2. Who are we?

The Parochial Church Council of Laughton, Ripe and Chalvington ("The PCC") 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 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, and by promptly reporting any breach to the Information Commissioner's Office.

We use your personal data for the following purposes: -

- To enable us to provide a voluntary service for the benefit of the public in our area;
- To administer membership records;
- To fundraise and promote the interests of the churches and our parish;
- To manage our employees and volunteers, including preparation and publication of rotas;
- To maintain our own accounts and records (including the processing of gift aid applications);
- To inform you of news, events, activities and services running in our parish;
- To maintain statutory records of marriages, baptisms and funerals, and comply with statutory obligations relating to record-keeping;
- To operate the web-site in order to provide information to its readers.

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

- Processing is necessary for the purposes of the legitimate interests pursued by the Parish of Laughton, Ripe and Chalvington and the churches within it, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child. (*GDPR Article 6(1)(f)*).
- Processing is necessary for the performance of a contract to which the data subject is party, or in order to take steps at the request of the data subject, prior to entering into a contract. (*Article 6(1)(b)*).

- Processing is necessary for compliance with a legal obligation (*Article 6(1)(c)*).
- Processing when the data subject has given consent to the processing of his or her personal data for one or more specific purposes, and where such consent is informed and freely given within Article 7. (*Article 6(1)(a)*).

Sensitive personal data. (Requires an initial lawful basis from Article 6 and an additional basis from Article 9).

- Where the personal data is classed as sensitive, because it reveals “religious belief”, we will not reveal it to third parties without specific consent: in that case we will rely on Article 6(1)(a) and also 9(2)(a).
- Other processing of sensitive data is necessary for the purposes of the legitimate interests pursued by the parish and the churches within it, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child. (*GDPR Article 6(1)(f)*).

This processing is carried out in the course of the legitimate activities, with appropriate safeguards, by a foundation, association or any other not-for-profit body with inter alia, a, philosophical or religious aim, and on condition that the processing relates solely to the members or to former members of the body or to persons who have regular contact with it in connection with its purposes, and that the personal data are not disclosed outside that body without the consent of the data subject. (*GDPR Article 9(2)(d)*).

5. Sharing your personal data.

Your personal data will be treated as strictly confidential and will only be shared with other members of the churches in order to carry out a service to other church members, or for purposes connected with the churches. We will only share your data with third parties outside the parish with your consent, or where required by law.

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 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 holds about you;

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/more/libraries-and-archives/records-management-guides>

- The right to request that the PCC corrects any personal data if it is found to be inaccurate or out of date;
- The right to request that your personal data be erased where it is no longer necessary for the PCC to retain such data;
- The right to withdraw your consent to the processing at any time;
- The right to request that the data controller provides 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 PCC has no automated means as at September 2018.
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction be placed on further processing;
- The right to object to the processing of personal data, (where applicable) [*Only applies in this document where processing is based on legitimate interests*];
- 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 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.

10. Contact Details

To exercise all relevant rights, queries or complaints please in the first instance contact the Parish Administrator at administrator@lrcchurches.co.uk

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.
