

External Privacy Policy
Version 1- Aug 2018



Introduction

Trinity Cheltenham is committed to protecting personal data and respecting your privacy. We value the personal information entrusted to us and we respect that trust, by complying with all relevant laws, the Data Protection Act 2018 and the Church Representation Rules and the Human Rights Act 1998, and adopting good practice.

Everyone has rights with regard to the way in which their personal information is handled. During the course of our activities we will collect, store and process personal information and we recognise that the correct and lawful treatment of this data will maintain confidence in the organisation and will provide for successful operations.

This policy sets out the basis on which any personal information we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal information and how we will treat it.

For the purpose of UK data protection laws, the data controller is Trinity Cheltenham, of 100-102 Winchcombe Street, Cheltenham, Gloucestershire GL52 2NX

Why this policy is important - data protection principles

When processing your information, we must comply with the six enforceable principles of good practice. These provide that your personal information must be:

- processed lawfully, fairly and in a transparent manner,
 - processed for specified, explicit and legitimate purposes,
 - adequate, relevant and limited to what is necessary,
 - accurate and kept up-to-date,
 - kept for no longer than is necessary, and
 - processed in a manner that ensures appropriate security.
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What personal information do we process?

In the course of our work, we may collect and store different kinds of personal information about you. This includes data we receive direct from the person it is about, for example, where they complete forms (paper or online) or contact us.

We process personal data in both electronic and paper form and all this data is protected under data protection law. The personal data we process can include:

Identity Data, such as your name, marital status, date of birth, gender,

Contact Data, such as your address, personal email address and personal telephone numbers,

Document Data, such as passport number for overseas mission trips,

Medical Data, such as details of some medical conditions, medication and allergies,

Financial Data, such as gift aid

Technical Data, including IP addresses, your log-in data, browser type and versions, operating system and platform and other technology on the devices you use to access our website.

‘Special category’ data

Information relating to your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, criminal convictions, sex life or sexual orientation, or certain types of genetic or biometric data is known as ‘special category’ data.

During the course of liaising with you, we may collect ‘special category’ data about you. If this is required, we will seek your consent before doing so.

How we collect your personal information

We may obtain personal information by directly interacting with you, such as:

- meeting with you in our church, at events or elsewhere,
- logging onto the wi-fi network in our offices,
- filling in forms on our website,
- participating in discussion boards or other social media functions on our website,
- entering a competition, promotion or survey organised by us, or otherwise providing us with feedback,
- subscribing to one of our courses or programmes
- subscribing to our services or publications, or otherwise requesting marketing material to be sent to you, or
- corresponding with us by phone, email, letters or otherwise.

Purposes for which we will use your personal information

We may use your personal information for a number of different purposes. For each purpose, we are required to confirm the ‘legal basis’ that allows us to use your information, as follows:

Purposes for which we will use the information you give to us	Legal basis
To register you as a new member	It will be necessary for the performance of the relationship between you and us
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);	We are required by the Church Representation Rules to administer and publish the electoral roll
To process a donation that you have made (including Gift Aid information)	Processing is necessary for carrying out legal obligations in relation to Gift Aid or under employment, social security or social protection law, HMRC and other statutory requirements.

<p>To send you communications which you have requested or that may be of interest to you. These may include information about campaigns, appeals and other fundraising activities or promotion of the church</p>	<p>It will be necessary for our legitimate organisation interests to ensure you are aware of the latest developments and updates of activities that are occurring and to develop out relationship</p> <p>Where you would not normally have a reasonable expectation of receiving such communications from us, we will only send you invites if you agree</p>
<p>To seek your opinions, views or comments</p>	<p>It will be necessary for our legitimate organisation activities to ensure that we are providing you with the best service and to identify improvements where required</p>
<p>To notify you of changes to our facilities, policies, services, events and staff</p>	<p>It will be necessary for our legitimate organisation interests, namely to keep you up to date with any changes</p>
<p>To inform you of news, events, activities and services running</p>	<p>It will be necessary for our legitimate organisation interests</p>
<p>To maintain our own accounts and records (including the processing of gift aid applications);</p>	<p>Processing is necessary for carrying out legal obligations in relation to Gift Aid or under employment, social security or social protection law, HMRC and other statutory requirements.</p>
<p>To enable us to provide a church body voluntary service for the benefit of the public in a particular geographical area</p>	
<p>To minister to you and provide you with pastoral and spiritual care (such as visiting you when you are gravely ill or bereaved) and to organise and perform ecclesiastical services for you, such as baptisms, confirmations, weddings and funerals.</p>	<p>Under Canon Law to announce forthcoming weddings by means of the publication of banns.</p>
<p>To carry out 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;</p>	<p>Processing is necessary for carrying out legal obligations in relation to Gift Aid or under employment, social security or social protection law, HMRC and other statutory requirements.</p>
<p>To administer our website, ChurchSuite and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes, to allow you to participate in interactive features of our service, when you choose to do so, to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you and to make suggestions and recommendations to you and other users of our website about goods or services that may interest you or them</p>	<p>It will be necessary for our legitimate organisation interests to ensure you receive the best experience possible when accessing and using our website. We will comply with our cookie policy when processing this information</p>

Enter information you have provided for 'Community Corner'	We will only add this information if we have your consent
To register you on one of our courses, such as Talking Relationships, Discipleship Year, Marriage Preparation, Marriage Course, Restored Lives.	It will be necessary for our legitimate to ensure that we have the correct information about you and to provide you with the service you are expecting
To register you on one of our 'Connect' programmes such as Life Group, Prayer, Serve, Giving, Schools Out, Messy Church,	It will be necessary for our legitimate to ensure that we have the correct information about you and to provide you with the service you are expecting

We may also collect personal information about you from third parties or publicly-available sources, such as:

- your family members, friends, neighbours, your business colleagues and other contacts,
- analytics providers (such as Google),
- advertising networks,
- providers of technical, payment and delivery services

We will only use your personal information for the purpose(s) for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

What if you cannot or will not provide us with your personal information

It may be a requirement for you to provide us with certain information, namely sufficient information to provide pastoral care such as prayer, courses, life group membership and events. If you do not provide us with that information, we will be unable to provide you with such support.

We may obtain personal information via automated technology when you interact with our website by using cookies, server logs and other similar technologies.

How we use your personal information

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- you have given us consent,
- we need to perform a contract we are about to enter into, or have entered into, with you,
- where it is necessary for our or a third party's legitimate interests, and your interests and rights do not override those interests, or
- where we need to comply with a legal or regulatory obligation.

We will only use 'special category' information:

- provided we have your explicit consent to use it,
- where we believe that we need to use that data to protect your vital interests where you are not able to provide us with your explicit consent,
- where it is necessary for reasons of substantial public interest,
- where you have previously made that data public knowledge,
- if we need to use that data to establish, exercise or defence legal claims, or
- where there is some other legal basis that allows us to use that information.

We will not hold information relating to criminal proceedings or offences or allegations of offences unless there is an overarching safeguarding requirement to process this data for the protection of children and vulnerable adults.

We may share your personal information with the parties set out below:

- The appropriate bodies of the Church of England including the other data controllers
- Other clergy or lay persons nominated or licensed by the bishops of the diocese to support the mission of the Church in our area. For example, 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 the church's mission in support of our regular clergy
- Other persons or organisations operating within the diocese as appropriate.
- On occasion, with other diocesan clergy where we are carrying out joint events or activities
- External statutory bodies (police, social care etc) where this is legally required.
- In the event of employee related tasks including payroll and pension provisions.
- our professional advisers (including solicitors, bankers, auditors and insurers),
- Gift aid information is given to HMRC via their website
- Google Drive and ChurchSuite
- analytics and search engine providers that assist us in the improvement and optimisation of our website
- The Money Matters team where you have requested an appointment
- Legal and statutory guidance and others; In compliance with the range of our responsibilities; including
 - those involving land/glebe
 - Property purchases and sales
 - Tenancy arrangements
 - Employment
 - HMRC
 - The Charity Commission
 - Insurers and legal advisers as appropriate.

- Relating to safeguarding issues, the Police, Probation, Social Care and Children’s Services.

We require all third parties to respect the security of your personal information and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal information for their own purposes and only permit them to process your personal information for specified purposes and in accordance with our instructions

Keeping data and destroying it

We will not keep personal data longer than is necessary for the purposes that it was collected for. We keep data in accordance with the guidance set out in the guide “Keep or Bin:Care of Your Parish Records” http://www.lambethpalacelibrary.org/files/Parish_Records_0.pdf

How long we will store your personal information

The length of time that we will store your data will depend on the ‘legal basis’ for why we are using that data, as follows:

Legal basis	Length of time
Where we use/store your data because it is necessary for the performance of the contract between you and us	We will use/store your data for as long as it is necessary for the performance of the contract between you and us
Where we use/store your data because it is necessary for us to comply with a legal obligation to which we are subject	We will use/store your data for as long as it is necessary for us to comply with our legal obligations
Where we use/store your data because it is necessary for our legitimate business interests	We will use/store your data for as long as it is necessary for our legitimate business interests, or such earlier time as you ask us to stop. However, if we can demonstrate the reason why we are using/storing your data is more important than your interests, rights and freedoms, then we will be allowed to continue to use/store your data for as long as it is necessary for our legitimate business interests
Where we use/store your data because you have given us your specific, informed and unambiguous consent	We will use/store your data until you ask us to stop

To determine the appropriate retention period for personal information, we consider the amount, nature and sensitive of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

Specifically we will 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 registers permanently.

Cookie policy

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our website. A cookie

is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.
- **Analytical/performance cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- **Functionality cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website.

Except for essential cookies, all cookies will expire after a maximum of two years.

Security of personal data

We will take all steps reasonably necessary to ensure that your data is treated securely, including taking the following safeguards:

- **Entry controls.** Access to our offices is secured by means of electronic entry controls.
- **Secure lockable desks and cupboards.** Desks and cupboards are kept locked when not in use if they hold confidential information of any kind.
- **Methods of disposal.** Paper documents are disposed of by shredding in a manner that ensures confidentiality.
- **Equipment.** Our internal policies require that users lock or log-off from their computer when it is unattended.
- **Firewalls and encryption.** We apply industry-standard firewall protection and encryption technology.
- **Training.** We ensure our employees are trained in the importance of data security.
- **Electronic access.** All data stored electronically is password-protected. Where we have provided an authorised user with a password, that user is responsible for keeping this password confidential and is not permitted to share the password with anyone.
- **Overseas transfers.** Whenever we transfer your personal information outside the United Kingdom, we ensure a similar degree of protection is afforded to it by ensuring that we apply appropriate safeguards (either by transferring data only to recipients in the European Economic Area, to recipients in countries approved by the European Commission, to recipients that are party to the EU-US Privacy Shield, or by using specific contracts approved by the European Commission).

Some of the data that we collect from you may be transferred to third parties who will store the data at a destination outside the United Kingdom. If you are concerned about the levels of data security in those countries, please let us know and we will endeavour to advise what steps will be taken to protect your data when stored overseas.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Your rights

You have various legal rights in relation to the information you give us, or which we collect about you, as follows:

- You have a right to access the information we hold about you free-of-charge, together with various information about why and how we are using your information, to whom we may have disclosed that information, from where we originally obtained the information and for how long we will use your information.
- You have the right to ask us to rectify any information we hold about you that is inaccurate or incomplete.
- You have the right to ask us to erase the information we hold about you (the 'right to be forgotten'). Please note that this right can only be exercised in certain circumstances and, if you ask us to erase your information and we are unable to do so, we will explain why not.
- You have the right to ask us to stop using your information where: (i) the information we hold about you is inaccurate; (ii) we are unlawfully using your information; (iii) we no longer need to use the information; or (iv) we do not have a legitimate reason to use the information. Please note that we may continue to store your information, or use your information for the purpose of legal proceedings or for protecting the rights of any other person.
- You have the right to ask us to transmit the information we hold about you to another person or company in a structured, commonly-used and machine-readable format. Please note that this right can only be exercised in certain circumstances and, if you ask us to transmit your information and we are unable to do so, we will explain why not.
- Where we use/store your information because it is necessary for our legitimate business interests, you have the right to object to us using/storing your information. We will stop using/storing your information unless we can demonstrate why we believe we have a legitimate business interest which is more important than your interests, rights and freedoms.
- Where we use/store your data because you have given us your specific, informed and unambiguous consent, you have the right to withdraw your consent at any time.
- You have the right to object to us using/storing your information for direct marketing purposes.

If you wish to exercise any of your legal rights, please contact our Operations Manager, by writing to the address at the top of this policy, or by emailing us at dataprotection@trinitychurch.co.uk

You also have the right, at any time, to lodge a complaint with the Information Commissioner's Office if you believe we are not complying with the laws and regulations relating to the use/storage of the information you give us, or that we collect about you.

Opting out of receiving marketing communications

You can ask us to stop sending you marketing communications at any time by contacting our Operations Manager, by writing to the address at the top of this policy, or by emailing us at dataprotection@trinitychurch.co.uk

Automated decision-making

We do not use automated decision-making processes.

Where we store your information

We will take all reasonable steps to ensure your data is stored securely.

Third party links

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

Changes to our policy

Any changes we make to our policy in the future will be posted on our website and, where appropriate, notified to you by email or via social media. Please check our website frequently to see any updates or changes to our policy.

Contact

Questions, comments and requests regarding this policy are welcomed and should be addressed to Data Protection, by writing to the address at the top of this policy, or by emailing us at dataprotection@trinitychurch.co.uk

APPENDIX 1

Definitions and Useful Terms

Personal data

This is information about a living individual which is capable of identifying that individual.

The Data Subject

This is the person about whom personal data are processed.

Processing

This is anything done with/to personal data, including storing it.

The data controller

Is the person or organisation who determines the how and what of data processing, this is the PCC and the incumbent.

ICO

This means the Information Commissioner's Office which is the UK's regulatory body responsible for ensuring that we comply with our legal data protection duties. The ICO produces guidance on how to implement data protection law and can take regulatory action where a breach occurs.

Privacy notice

This is the information given to data subjects which explains how we process their data and for what purposes.

APPENDIX 2
ICO Registration

Data Controller: Mike Darbandi on behalf the PCC

Data Controller: Rev Andrew Blyth

Trinity Cheltenham

Registration Number: ZA310745

Date Registered: Registration Expires 13/2/2019

Address: Trinity House 100-102 Winchcombe Street, Cheltenham,
Gloucestershire, GL52 4EZ