

## **Data Privacy Policy for churches in the Lordsbridge Team**

**17 Nov 2021**

**Version 1.1**

This policy tells you how the churches and worshipping communities of the Lordsbridge Team of Churches store and use your personal data.

### **1. Your personal data - what is it?**

Personal data is the information that can identify you as a living individual. 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 collects and controls your data?**

The Parochial Church Council (PCC) of **(INSERT CHURCH NAME)** and the Lordsbridge Team Council are Joint Data Controllers. This means they decide how your personal data is processed, for what purposes it is used and who sees it. The PCC are the trustees and governing body of the ecclesiastical (church) parish. The Team Council is the governing body of the benefice or legal grouping of parishes known as the Lordsbridge Team of Churches. **(INSERT CHURCH NAME)** is a member of the Lordsbridge Team of Churches. The Joint Data Controllers are required to inform you of any changes to this policy.

### **3. How do we process your personal data?**

The Lordsbridge Team Council, and the PCC complies with their obligations under "GDPR" by keeping personal data up to date; by ensuring it is stored and destroyed 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.

To help do this, the Lordsbridge Team Council contracts iKnow Church to provide data management services to all the parishes in the Lordsbridge Team of Churches. iKnow Church is a reputable provider of data management services and is the preferred provider of parish data management services for The Church of England. iKnow Church is compatible and runs in step with the Life Events Diary, a Church of England subsidised resource. The Lordsbridge Team Council, jointly with each PCC is the Data Controller for the data collected by that PCC, and iKnow Church is the Data Processor. For more detailed technical specifications around iKnow Church, please see the end of this notice.

### **4. What do we use your data for?**

We use your personal data for the following purposes:

- To enable us to "provide a service for the benefit of the public in a particular geographical area as specified in our constitution"; eg, to enable the administration and

planning of weddings and funerals, to respond to requests for pastoral visits, to manage specific community projects.

- To administer membership and electoral roll records.
- To fundraise and promote the interests of the PCC as a charity.
- To manage and communicate with our volunteers (and where appropriate employees); e.g., to organise rotas.
- To maintain our own financial accounts and records (including the processing of gift aid applications).
- To inform you of news, events, activities, and services taking place in one or more of the Lordsbridge Team Churches, and diocesan and national events deemed of interest locally.

## **5. What is the legal basis for processing your personal data?**

Under GDPR, we can only process your data where:

- We have your explicit consent to keep you informed about news, events, activities, and services and process your gift aid donations as described above.
- 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 political, philosophical, religious 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.

## **6. Do we share your personal data?**

Your personal data will be treated as strictly confidential and will only be shared with other members of the team for purposes connected with the church or team. We will only share your data with third parties outside of the Lordsbridge Team with your consent.

## **7. How long do we keep your personal data<sup>1</sup>?**

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 here: <https://www.churchofengland.org/more/libraries-and-archives/records-management-guides>.

For example, 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.

## **8. 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 Lordsbridge Team Council holds about you.
- The right to request that the PCC and the Lordsbridge Team Council 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 Lordsbridge Team council 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 you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable) [*Note this 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 object to the processing of personal data, (where applicable) [*Note this only applies where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics*]
- The right to lodge a complaint with the Information Commissioners Office.

### **9. 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.

### **Contact Details**

To exercise all relevant rights, and for queries or complaints please in the first instance contact the Lordsbridge Resource Hub at [rebeccaherrick@lordsbridge.org](mailto:rebeccaherrick@lordsbridge.org)

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.

### **FAQs about in the use of iKnow Church as our data processor:**

#### **Q. Who can see my data?**

A. Access to data is limited to those who really need to have access to it. In the case of the Lordsbridge Team it will be the Core Team of Lordsbridge clergy, the database administrators (currently Becca and Robbie) and nominated persons from your church (in most cases this will be one or two local ministers and the church wardens). There is no way within iKnow Church that mailing list members will see other members data.

#### **Q. Can anyone see any of my financial information?**

A. Absolutely not. iKnow Church stores no financial information, only personal contact information.

#### **Q. Can anyone see any of my safeguarding information?**

A. No - all safeguarding information is stored with the incumbent or PSO (Parish Safeguarding Officer) and not in iKnow Church.

**Q. Does this mean I'll now be contacted by iKnow Church?**

A. No. iKnow Church will not contact anyone in the Lordsbridge database. All contact will come from those within the Lordsbridge Team who have access to your data – so you may receive an email from a minister via iKnow Church but you will not receive any marketing or sales emails, letters or phonecalls from iKnow Church.

**Q. Is my data more secure?**

A. Yes! Currently church data is stored securely but is stored in spreadsheets on laptops or computers. Storing data in iKnow Church, on dedicated servers, ensures it is safe, regularly backed up (something we can't always easily manage when data is stored on ministers' spreadsheets), easily accessible to those specified people who need to have access (also something we can't always easily manage when data is stored on ministers' spreadsheets), stored in one place only, and is fully compliant with GDPR law.

**Q. If this database is used by more than one parish, will my data just be lumped with everyone elses?**

A. No. Within iKnow Church we have created separate 'parishes' meaning the data of one church is not jumbled up with the data from another church. This means data that is input from Hardwick, for example, is kept separate and managed as an individual parish.

**Q. How can we trust iKnow Church?**

A. iKnow Church is the recommended and preferred database provider for the Church of England. It has been created and tailored specifically for use by Church of England parishes. It is used by hundreds of churches across the country and is regularly improved and updated.

**Technical details about iKnow Church**

The following points detail the iKnow Church policies regarding the storage of church data:

**Data Encryption** - All personal data is encrypted with 256 bit encryption.

**SSL Connections** - All connections to iKnow Church are made over TLS (previously SSL) ensuring that no one can access any of the Lordsbridge Team sensitive data. The iKnow Church certificates use TLS 1.2

**Servers** - Each church/benefice or team has its own database to ensure that churches can only access their own data. iKnow Church servers are only used to host iKnow Church clients and the server space is not shared by any other organisations. iKnow Church servers are located in the UK.

**User Permissions** - With iKnow, the individual church/benefice or team office controls who can access the different areas of iKnow. There are powerful access controls built into iKnow to ensure that only the right people can access data.

**Backups** - Backups are created each night and the retention period is 9 months.

