**DATA PROTECTION AND PRIVACY NOTICE**

**The Parochial Church Council (PCC) of the Church of the Annunciation, South Kenton, Willesden Diocese**

# 1. Your personal data – what is it?

Personal data relates to a living individual who can be identified from that data (for example a name, photographs, videos, email address, or address). 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 are we?

The PCC of the Church of the Annunciation, South Kenton, 194, Windermere Ave, Wembley, Middlesex, HA9 8QT ( “the C o A PCC”), is the data controller. This means it decides how your personal data is processed and for what purposes.

The Church of England is made up of a number of different organisations and office-holders who work together to deliver the Church’s mission in each community. The PCC works together with: -

* The incumbent of the parish
* The bishops of the Diocese of London
* The London Diocesan Fund, which is responsible for the financial and administrative arrangements for the Diocese of London.

As the Church is made up of all of these persons and organisations working together, we may need to share personal data we hold with them so that they can carry out their responsibilities to the Church and our community. The organisations referred to above are joint Data Controllers. This means we are all responsible to you for how we process your data. Each of the Data Controllers have their own tasks within the Church and a description of what data is processed and for what purpose is set out in this Privacy Notice. This Privacy Notice is sent to you by the PCC on our own behalf and on behalf of each of these Data Controllers. In the rest of this Privacy Notice, we use the word “we” to refer to each Data Controller, as appropriate.

# 3. What data do the Data Controllers listed above process?

They will process some or all of the following where necessary to perform their tasks: -

* Names, titles and aliases, photographs;
* Contact details such as telephone numbers, addresses, and email addresses;
* Where they are relevant to our mission, or where you provide 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, family composition, and dependants;
* Where you make donations or pay for activities such as use of a church space, financial identifiers such as bank account numbers, payment card numbers, payment/transaction identifiers, policy numbers, and claim numbers;
* The data we process is likely to constitute sensitive personal data because, as a parish church, the fact that we process your data at all may be suggestive of your religious beliefs. Where you provide this information, we may also process other categories of sensitive personal data.

# 4. How do we process your personal data?

The C o A PCC and the Data Controllers set out in paragraph 2 above comply with their 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 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 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;
* 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;
* To deliver the 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 each Data Controller;
* To administer the parish, deanery, archdeaconry and diocesan membership records;
* To fundraise and promote the interests of the Church and charity;
* To maintain our own accounts and records;
* To process a donation that you have made (including Gift Aid information);
* To seek your views or comments;
* To notify you of changes to our services, events and role holders;
* 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 enable us to provide a voluntary service for the benefit of the public in a particular geographical area as specified in our constitution;
* To inform you of news, events, activities and services running at the Church of the Annunciation;
* To share your contact details with the Diocesan office so they can keep you informed about news in the diocese and events, activities and services that will be occurring in the diocese and in which you may be interested.

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

* Most of our data is processed because it is necessary for our **legitimate interests**, or the **legitimate interests** of a third party (such as another organisation in the Church of England). An example of this would be our safeguarding work to protect children and adults at risk. We will always take into account your interests, rights and freedoms.
* The C o A PCC also has a legitimate interest in communicating with church-attendees about fundraising activities, Gift Aid or community events.
* Some of our processing is necessary for **compliance with a legal obligation**. For example, 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. Processing is necessary for carrying out legal obligations in relation to Gift Aid or pursuant to employment, social security or social protection law, or a collective agreement;
* We may also process data if it is necessary for the **performance of a contract** with you, or to take steps to enter into a contract. An example of this would be processing your data in connection with the hire of parish church facilities.
* Religious organisations are also permitted to process information about your religious beliefs **to administer membership or contact details**.
* Where your information is used other than in accordance with one of these legal bases, we will first **obtain your consent** to that use.

6. Sharing your personal data  
Your personal data will be treated as strictly confidential. It will only be shared with third parties where it is necessary for the performance of our tasks or where you first give us your prior consent. It is likely that we will need to share your data with some or all of the following (but only where necessary):

* The appropriate bodies of the Church of England including the other Data Controllers;
* Our agents, servants and contractors. For example, we may ask a commercial provider to send out newsletters on our behalf, or to maintain our database software;
* Other clergy or lay persons nominated or licensed by the bishops of the Diocese of London to support the mission of the Church in our parish. For example, our 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 our mission in support of our regular clergy;
* Other persons or organisations operating within the Diocese of London including, where relevant, the London Diocesan Board for Schools and Subsidiary Bodies;
* On occasion, other parish churches with which we are carrying out joint events or activities.

7. How long do we keep your personal data[[1]](#footnote-1)?  
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 7 years after the calendar year to which they relate; and
* parish registers (baptisms, marriages, funerals) permanently
* In general, we will endeavour to keep data only for as long as we need it. This means that we may delete it when it is no longer needed.

.

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. When exercising any of the rights listed below, in order to process your request, we may need to verify your identity for your security. In such cases we will need you to respond with proof of your identity before you can exercise these rights: -

### The right to access information we hold on you

At any point you can contact us to request the information 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.

### 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 Data 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).

### The right to object to the processing of personal data where applicable.

### The right to lodge a complaint with the Information Commissioner’s Office.

9. 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.

10. 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.

11. Changes to this notice

We keep this Privacy Notice under regular review and we will place any updates on www. This notice was last updated on 10 February 2019

12. Contact Details

To exercise all relevant rights, queries or complaints please in the first instance contact the PCC Secretary / Parish Administrator at the Church of the Annunciation, 194 Windermere Avenue, Wembley, HA9 8QT.

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.

**LAST UPDATED 10 February 2019**

**Review date: February 2021**

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> [↑](#footnote-ref-1)