

## **Privacy Policy**

### **Parish of St. Mary the Virgin, Harefield**

#### **GDPR**

The General Data Protection Regulation ('**GDPR**') came into force on 25 May 2018 and replaced the UK Data Protection Act 1998.

Broadly speaking, GDPR is intended to give people more control over how their data is collected, held and used. It places greater responsibility on '**data controllers**' (the persons who determine why and how data is processed).

#### **Personal Data**

'**Personal data**' is any information about a living individual (the '**data subject**') which allows them to be identified from that data.

The term covers a number of different types of information such as names, titles, addresses, telephone numbers, email addresses, gender, age, date of birth, nationality, marital status and family details.

For the purpose of donation or payment to the church or church hall, it may also include bank account details, etc.

#### **Data Controllers**

At St. Mary's Church, Harefield, the 'data controllers' are:

- the Parochial Church Council (**PCC**) which is a registered charity, number 1131313
- the '**Incumbent**' (the vicar), at present the Reverend Martin Davies

In this document, the terms 'we', 'us' and 'our' refer to the PCC and/or the incumbent, as the context requires.

#### **How we process personal data**

As data controllers, we are required by law to keep personal data up-to-date, to store it securely, to protect it from loss, misuse, unauthorised access and disclosure, to destroy it securely and not to collect or retain excessive amounts of data.

We may use for some or all of the following purposes (these are known under GDPR as our '**legitimate interests**')

- to maintain legal documents such as the Electoral Roll, Baptism, Marriage and Burial Registers
- to carry out safeguarding procedures with the aim of ensuring that children and adults-at-risk are provided with safe environments
- to provide pastoral and spiritual care and to organise and perform ecclesiastical services, such as baptisms, weddings and funerals
- to administer the parish, deanery, archdeaconry and diocesan records
- to contact and serve the parish community
- to fundraise and promote the interests of St. Mary's and the wider church
- to maintain our own internal accounts and records
- to process donations or payments (including Gift Aid information)
- to notify changes to our services and events etc.
- to send requested communications

## **The lawful basis for processing personal data**

We can legally process personal data:

- if we have the explicit consent of the data subject in order to keep them informed about news, events, activities and services and to process Gift Aid donations
- under the terms of a contract made, e.g. hiring the church hall
- if we are under a legal obligation to do so, e.g. disclosing Gift Aid data to HMRC or to comply with a police investigation
- if the processing is in the public interest. In the Church of England this extends to items which must be kept for archiving and/or Ecclesiastical/Canonical law purposes, e.g. the completion of marriage and baptism registers
- if there is a 'legitimate interest' for processing the data (see section above)

## **Consent**

If information is to be used other than under one of these legal bases, we will first obtain consent to that use. It is a key feature of GDPR that consent must be 'freely given, specific, informed and unambiguous'.

Data subjects are also able to revoke their consent easily.

## **Keeping personal data**

We will keep some records permanently if we are legally required to do so. We may keep some other records for an extended period of time, e.g. it is current best practice to keep financial records for a period of seven years to support HMRC audits.

In general, we will endeavour to keep data only for as long as we need it. We will delete it when it is no longer needed.

## **Rights of data subjects**

Unless subject to an exemption, data subjects have the following rights in respect of their personal data:

- the right to request a copy of the personal data which St. Mary's holds on them
- the right to request that St. Mary's corrects any personal data if it is found to be inaccurate or out-of-date
- the right to request that personal data is erased when it is no longer necessary for St. Mary's to retain it (known as 'the right to be forgotten')
- the right to withdraw consent to the processing of personal data at any time
- the right to request that the data controller transmits their personal data where possible directly to another data controller where applicable (known as the right to data portability)
- the right, where there is a dispute in relation to the accuracy or processing of personal data, to request that a restriction is placed on further processing
- the right to object to the processing of personal data
- the right to lodge a complaint with the Information Commissioner's Office

## **Transfer of data abroad**

Our website ([www.stmarys-harefield.org.uk](http://www.stmarys-harefield.org.uk)) is accessible from overseas. We will ensure that any personal data that it contains is correctly authorised.

## **Updates to this policy**

We may from time to time update this policy notice due to changes in law and/or current best practice.

We will endeavour to communicate the fact of any update. The most recent version can always be found on [www.stmarys-harefield.org.uk](http://www.stmarys-harefield.org.uk).

### **Contact Details**

Please contact us with any questions about this Privacy Policy notice or the information we hold or to exercise all relevant, rights, queries or complaints at:

- St. Mary's Parish Office at 28 Countess Close, Harefield UB9 6DL  
Tel: 01895 825960  
Email: [office@stmarys-harefield.org.uk](mailto:office@stmarys-harefield.org.uk)  
or
- The incumbent, the Reverend Martin Davies, at:  
28 Countess Close, Harefield UB9 6DL  
Tel: 01895 825960  
Email: [martin@stmarys-harefield.org.uk](mailto:martin@stmarys-harefield.org.uk)

The Information Commissioner's Office can be contacted at:  
Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF  
Tel: 0303 123 1113  
Website: [www.ico.org.uk](http://www.ico.org.uk)

Policy dated March 2019