

## **Church of St Mary & St John the Divine Balham**

### **Privacy Notice**

#### **Your personal data – what is it?**

Personal data is any information about a living individual which allows them to 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. The processing of personal data is governed by the Data Protection Act 2017, the General Data Protection Regulation 2016/679 (the “GDPR”) and other legislation relating to personal data and rights such as the Human Rights Act 1998.

#### **Who are we?**

Church of St Mary & St John the Divine Balham is the data controller (contact details below). This means it decides how your personal data is processed and for what purposes. A description of what data is processed and for what purpose is set out in this Privacy Notice.

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 Church of St Mary & St John the Divine Balham works with the Diocese of Southwark, which is responsible for the financial and administrative arrangements for the Diocese of Southwark including safeguarding. From time to time we may need to share personal data we hold with the Diocese of Southwark so that they can carry out their responsibilities to the Church and our community.

#### **What data do we process?**

Names, titles, aliases and photographs;

Contact details such as telephone numbers, postal 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 our facilities, 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 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: racial or ethnic origin, mental and physical health, details of injuries, medication/treatment received, labour union affiliation, and data concerning sexual orientation and criminal records, fines and other similar judicial records.

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

Church of St Mary & St John the Divine Balham 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.

### **For what purposes do we use your personal data?**

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 in the parish, Diocese and beyond;

To administer membership records for Church activities and groups;

To fundraise and promote the interests of the Church;

To maintain our own accounts and records;

To manage our employees and volunteers;

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 inform you of news, events, activities and services at Church of St Mary & St John the Divine Balham or run by third party organisations;

To send you communications which you have requested and that may be of interest to you e.g. information about campaigns, appeals and 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; and

To monitor CCTV systems for the prevention and prosecution of crime.

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

Most of our data is processed because it is necessary for our legitimate interests. 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.

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.

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. Examples of this would be processing your data in connection with the hire of Church facilities, employment contracts or volunteer agreements.

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 for instance to keep you informed about news, events, activities and services and to process your gift aid donations.

### **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 other data controllers;

Other clergy or lay persons nominated or licensed by the bishops of the Diocese of Southwark to support the mission of the Church in our parish;

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 Southwark including, where relevant, the Southwark Diocesan Board of Education and Subsidiary Bodies;

There may be other legal entities we share data with within the Church of England who are also data controllers;

On occasion other churches with which we are carrying out joint events or activities.

### **How long do we keep your personal data?**

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; it is current best practice to keep financial records for a minimum period of 7 years to support HMRC audits; and parish registers (baptisms, marriages, funerals) are kept 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.

### **Your rights and 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 valid request including official evidence of your identity, 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 purposes).

**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 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**

You can object to the processing of personal data where applicable by telephone, email, or by post (see contact details below).

**The right to lodge a complaint with the Information Commissioner's Office**

For details of how to contact the Information Commissioner's Office, see contact details below.

**Transfer of data abroad**

Any electronic personal data transferred to countries or territories outside the EEA 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.

**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.

**Changes to this notice**

We keep this Privacy Notice under regular review and we will place any updates on the Church's website. This Notice was last updated in November 2018.

**Contact details**

To exercise all relevant rights, queries or complaints please in the first instance contact the parish administrator: email [administrator@stmarybalham.org.uk](mailto:administrator@stmarybalham.org.uk); telephone 020 8675 3278; or write to Church of St Mary & St John the Divine, Balham High Road, London SW12 9BS

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.

## **Use of cookies on the church website**

### **What is a cookie?**

A cookie is a small file of letters and numbers, which often includes a unique identifier that is sent to your device's browser from a website's computer and is stored on your device's hard drive. Cookies allow a website to recognise a user's device. Websites can send their own cookie to your browser if your browser's preferences allow it. For more information see [www.allaboutcookies.org/](http://www.allaboutcookies.org/)

On Church of St Mary & St John the Divine Balham's website, cookies record information about your online preferences and allow us to tailor the website to your needs. Cookies help us to provide a more personalised online service to you and our cookies do not store any sensitive or confidential information. You can set your computer/mobile phone/other device to accept all cookies, notify you when a cookie is issued, or not receive cookies at any time. Please bear in mind that certain personalised features of this website cannot be provided to you without the use of cookies. Each browser is different so check the 'Help' menu of your browser to learn how to change your cookie preferences if you wish to do so.

### **How does our website use cookies?**

During any visit to Church of St Mary & St John the Divine Balham's website the pages you view – along with a cookie – are downloaded to your device. This allows us to store information to operate the site as you move from page to page.

Church of St Mary & St John the Divine Balham uses cookies to help us analyse the profile of our visitors and provide them with a better, more personalised service. Cookies also allow us to provide our service to you e.g. by recognising you when you access the website and by making it easier for you to navigate our website.

Our cookies do not store financial information nor information which is capable of directly identifying you (such as your name or address). Cookies simply allow our website to retrieve this information from our systems in order to personalise and improve your experience of our website. Each browser is different so check the 'Help' menu of your browser to learn how to change your cookie preferences if you wish to do so.

### **Third-party cookies**

When you are on Church of St Mary & St John the Divine Balham's website you may notice that there is content from other websites which we add from time to time. As a result, you may be sent cookies from these other websites. Church of St Mary & St John the Divine Balham does not control these cookies and we suggest you check these third-party websites for more information about the cookies they use and how you can manage them.

You can set your browser to reject cookies (see the 'Help' menu of your browser to find out how to do this), but please bear in mind that if you do this, certain personalised features of this website cannot be provided to you.

2018