

DATA PRIVACY NOTICE

Servant's Church Limited (Company number 05817167)

Your privacy is important to us. We are committed to safeguarding the privacy of your information. Specifically, we:

- **Get your permission before releasing any of your data outside the church team**
- **Hold your data securely, and destroy it once no longer relevant**
- **Treat sensitive pastoral data as confidential between you and the pastor**

1. Your personal data – what is it?

Personal data relates to a living individual who can be identified from that data. From 26 May 2018, the processing of personal data is governed by the General Data Protection Regulation (the “GDPR”).

2. Who are we, and why are we collecting your data?

Servant's Church Limited is the data controller (contact details below).

We collect personal data to provide appropriate pastoral care, to arrange services, monitor them and assess their quality, to fulfil our purposes as a church, to meet our responsibilities as an employer, to fundraise, and to comply with laws.

3. What is the legal basis for processing (collecting, holding, using etc...) your personal data?

In legal terms this is called ‘legitimate interests’ and applies where we use your data in ways you would reasonably expect and which have a minimal privacy impact, or where there is a compelling justification for the processing.

Where we process sensitive data like your religious beliefs, (see GDPR Article 9.1), we are acting as a not-for-profit body with a religious aim and the processing relates only to members or former members (or those who have regular contact with us in connection with those purposes); and there is no disclosure to a third party without consent.

When required, we may also ask you for your consent to process your data, for example, in order to include you in the Servant's Church directory, or in order to use a recognizable photo of you on a website.

We do not share your information with others except as described in this notice.

4. The categories of information that we may collect, hold and share include:

- Personal information (such as name, telephone number, address and email address)
- Family information (such as parents, spouse)
- Characteristics (such as gender, ethnicity, language, nationality, birth country, special needs)
- Records (such as when you attended a Sunday school class, or when you helped with a service, video of services in which you participated, notes from pastoral meetings)
- Other information supplied by yourself (for example in a pastoral / counselling context, and your choices)

5. How do we process your personal data?

Servant's Church Limited complies with its obligations under data protection law by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining unnecessary 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 personal data for the following purposes: -

5.a If you are a Servant's Church employee, a volunteer helper, a contractor, or an applicant:

- To manage our employees and volunteers;
- To manage applications;
- To manage contractors' performance;
- To enable us to provide services for the benefit of the public, in line with our function as a Christian church;
- To fundraise and promote the interests of Servant's Church;

5.b If you donate to Servant's Church:

- To maintain our own accounts and records (including the processing of gift aid applications);
- To fundraise and promote the interests of Servant's Church;

5.c If you attend, or make use of Servant's Church services:

- To enable us to provide services for the benefit of the public, in line with our function as a Christian church;
- To administer and publish church directory records;
- To maintain our own accounts and records (including Sunday school attendance)
- To inform you of news, events, activities, and services running at Servant's Church;
- To fundraise and promote the interests of Servant's Church;

Specifically, we will not do the following: -

- Publish a recognizable photo of your face on internet media without your explicit consent
- Publish your personal data on internet media without your explicit consent

6. Some special arrangements

6.a If you send us sensitive information about yourself for prayer purposes rather than administrative purposes, it will be accepted for those purposes, and securely destroyed after the related prayer meeting. It will not be recorded on data records. If the law compels us to reveal such information to the authorities, we will reveal it.

6.b Pastoral records. Where pastoral information is supplied to a pastor in confidence, it would only be revealed beyond the data subject (the person it concerns) if:

- 1) Legally required
or
- 2) Church discipline or safeguarding implications required the full pastoral team to know.

Pastoral records may be retained until the third year after you have left Servant's Church, unless there is a reasonable possibility of future litigation concerning the pastor's advice.

Pastoral records are not stored on computers with internet connections.

As with other forms of your personal data, you have the right to request to see what pastoral information the church holds about you, and to have corrections made.

6.c Group Activities: If you attend a housegroup or other group activity organised by Servant's Church, attendees of a housegroup or other church function are not legally obligated to keep confidentiality, so please only share what personal information you would be happy to be passed on.

However, if an activity leader requests your personal data as part of an official Servant's Church activity, the request is subject to the church Privacy Notice.

Private personal functions (for example, parties, meals, trips etc) are not covered by Servant's church data protection policies, and any invitation you may receive to a private function is from the inviter, rather than from the church – irrespective of whether the inviter is also part of Servant's Church leadership.

7. Sharing your personal data

Except for the cases below, your personal data is treated as confidential and will only be shared with the church's staff and church volunteers, for use in church business and pastoral care only.

- Other members of the church directory will receive the subset of your personal data that you have given us for the directory, by email, and without restriction. We will ask you whether you want to appear on the published church directory.
- We may need to share your payroll data (if we employ you) and Gift Aid data (if you donate) with relevant UK Government authorities.
- If legally obliged to share your data, or if needed as evidence in a court case brought against Servant's Church or its team, we may share your data accordingly.
- Where we use 'cloud storage', your data will be encrypted to prevent access by others. Pastoral data will not be stored in the cloud.

Any other sharing of your data with third parties outside of Servant's Church will only be with your consent.

8. How long do we keep your personal data?

We keep data in accordance with Servant's Church Data Retention policy

We retain church directory data while we believe the data subject still wishes to use Servant's Church services, and we re-publish three or four times a year. While we believe you still wish to use Servant's Church services, we will contact you annually to check that the directory information we are holding is accurate and that you agree to us holding it.

General data about church attendees is retained until the third year after they have ceased to associate with the church. However, some types of data are kept longer. For example:

- Gift aid declarations and associated paperwork are held for 6 years after the gift's tax year.
- Employment and payroll data is held for 6 years.
- Data around accident records, risk assessments, student records, group membership records, and pastoral advice given may be kept longer in case needed for legal purposes.

After deletion of your data, we may keep a record of your name and the date on which your data was deleted for audit purposes.

9. Your rights and your personal data

Unless exempt under law, you have the following rights with respect to your personal data: -

- to request a copy of your personal data which Servant's Church holds about you;
- to request that Servant's Church corrects any personal data if it is found to be inaccurate or out of date, and to request your personal data is erased where it is no longer necessary for Servant's Church to retain such data;
- to withdraw your consent to the processing at any time
- to request that Servant's Church 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);
- 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;
- to object to the processing of personal data;
- to object to the processing of personal data for direct marketing;
- to lodge a complaint with the Information Commissioners Office (ico.org.uk)
- claim compensation for damages caused by a breach of Data Protection regulations

Note: If you are under 16, your personal data is provided by your parents or guardian.

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. Contact Details

To exercise all relevant rights, queries or complaints please in the first instance contact:
The Workforce Coordinator, Servant's Church Limited, 35 Ivy Road, Norwich, England, NR5 8BF
Email: ns@servantschurch.org.uk

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.