



# St Mary's Ewell

www.stmarysewell.com

## The Parochial Church Council of the Ecclesiastical Parish of Ewell

Registered Charity No: 1128409

### GENERAL DATA 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 Bill/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?**

This Privacy Notice is provided to you by the Parochial Church Council (PCC) of St Mary the Virgin, Ewell which is the data controller for your data.

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 (that is, our Vicar) and we may need to share personal data we hold with the incumbent so that he/she can carry out his/her responsibilities to the Church and our community. The PCC and the incumbent are referred to as joint data controllers. This means we are both responsible to you for how we process your data and for what purpose.

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 the incumbent. In the rest of this Privacy Notice, we use the word “we” to refer to each data controller, as appropriate.

#### **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 and videos;
- 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 we refund your expenses, you make donations or pay for activities such as use of a church hall, financial identifiers such as bank account numbers, payment card numbers, payment/transaction identifiers, policy numbers, and claim numbers;
- Other operational personal data created, obtained, or otherwise processed in the course of carrying out our activities, including but not limited to, CCTV footage, records of access to the church buildings, recordings of telephone conversations, IP addresses and website visit histories, logs of visitors, and logs of accidents, injuries and insurance claims;
- 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, sex life, mental and physical health, details of injuries, medication/treatment received, political beliefs, labour union affiliation, genetic data, biometric data, data concerning sexual orientation and criminal records, fines and other similar judicial records.

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

The data controllers will comply with their legal obligations to keep personal data up to date; to store and destroy it securely; to not collect or retain excessive amounts of data; to keep personal data secure, and to protect personal data from loss, misuse, unauthorised access and disclosure and to ensure that appropriate technical measures are in place to protect personal data.

We use your personal data for some or all of the following purposes:

- To enable us to meet all legal and statutory obligations. This includes maintaining and publishing our electoral roll in accordance with the Church Representation Rules and for this purpose we use the personal data you provide to:
  - i) determine eligibility for attendance and participation at the Annual Parochial Church Meeting and for election to the Parochial Church Council, deanery, diocesan and general synods where applicable;
  - ii) calculate the number of representatives who may be elected to each of these synods in the following year;
  - iii) undertake a review and revision of the electoral roll as necessary; and
  - iv) publish your name and address, by exhibiting the roll in our church;
- 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 vulnerable adults are provided with safe environments;
- To minister to you and provide you with pastoral and spiritual care (such as visiting you when you are 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 maintain our baptism, first communion, confirmation and wedding registers;
- To produce our orders of service;
- To administer the parish membership records;
- To manage any employees, office holders and volunteers;
- To fundraise and promote the interests of the Church and charity. This may include information about campaigns, appeals, other fundraising activities;
- To maintain our own accounts and records (including the processing of gift aid donations);
- To repay your expenses;
- To deliver any services which you may have purchased from us;
- To seek your views or comments;
- To notify you of changes to our services, events and role holders;
- To operate our accounts on social media;

- To stream on-line church services and other church events, to hold or participate in on-line meetings and to make video recordings of these activities which may be made available via links on our website or social media;
- To operate St Mary's Church web site and deliver the services that individuals have requested;
- To produce our monthly newspaper, Ewell Parish News;
- To inform you of news, events, activities and services running at St Mary's Church and other churches in the local area;
- 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;
- Our processing also includes the use of CCTV systems and access control and monitoring 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, 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.

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 (if you wish to be included on the electoral roll, you must complete an electoral roll application form), 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. An example of this would be processing your data in connection with the hire of church facilities.
- it is necessary to protect the vital interests of a data subject or another person;
- it is necessary for the performance of a task carried out in the public interest.

Where your information is used other than in accordance with one of these legal bases, we will first obtain your consent to that use.

### **If we process your sensitive personal data, in addition to the above, we will ensure that at least one of the conditions below is met:**

- you have given explicit consent to the processing of these personal data for one or more specified purposes;
- processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law;
- processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent;
- as a not-for-profit body with a religious aim, processing is carried out in the course of our legitimate activities with appropriate safeguards and on condition that the processing relates solely to our members or to our former members or to persons who have regular contact with us in connection with our purposes and that the personal data are not disclosed outside our body without the consent of the data subjects. For example, processing is necessary for the purpose of determining eligibility and creating and revising the electoral roll;

- processing relates to personal data which are manifestly made public by the data subject. For example, this includes publication of names and addresses on the electoral roll;
- processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity;
- processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law
- processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes.

Where personal data are collected directly from you, we will inform you whether you are obliged to provide the personal data and the consequences, if you do not provide the data.

### **Sharing your personal data**

Your personal data will be treated as strictly confidential and will be shared with other members of the church in order to carry out a service to other church members or for purposes connected with the church.

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 Guildford to support the mission of the Church in our parish. For example, our clergy are supported by our rural 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 Guildford;
- On occasion, other churches with which we are carrying out joint events or activities.

Where personal data have been manifestly made public by the data subject, these data may be shared where necessary with the general public.

We will only otherwise share your data with third parties with your consent.

### **How long do we keep your 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. For example, it is current best practice to keep financial records for a minimum period of 7 years to support HMRC audits. 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.

We keep your personal data for no longer than is reasonably necessary and 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.

### **Your rights and your personal data**

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.

1. 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.
2. 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.
3. 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)).
4. 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.
5. 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.
6. The right, where there is a dispute in relation to the accuracy or processing of your personal information, to request that a restriction is placed on further processing.
7. The right at any time to withdraw your consent to any processing of data for which consent was sought.
  - You can withdraw your consent easily by telephone, email, or by post (see Contact Details below).
8. The right to lodge a complaint with the Information Commissioner's Office.

### **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.

### **Further processing**

If we wish to use your personal data for a new purpose, not covered by this 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 our website at [www.stmarysewell.com](http://www.stmarysewell.com). We will also publish information about the revised Privacy Notice in our Weekly Notes and in the News section of our website. This Notice was last updated in May 2020.

### **Contact Details**

Please contact us if you have any questions about this Privacy Notice or the information we hold about you or to exercise all relevant rights, queries or complaints at:

The Parish Administrator  
St Mary's Ewell Parish Church  
London Road  
Ewell KT17 2AY  
Tel: 020 8393 2643  
Email: [parishoffice@stmarysewell.com](mailto:parishoffice@stmarysewell.com).

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.