



Privacy Notice - Emmanuel Church, Cheltenham

We are committed to protecting and respecting your privacy.

Everyone has rights with regard to the way in which their personal data is handled. During the course of our church activities we will collect, store and process personal data about our parishioners, suppliers and other third parties, and we recognise that the correct and lawful treatment of this data will maintain confidence in our mission and service to the community.

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purpose of UK data protection laws, the data controllers are the Parochial Church Council (PCC) of Emmanuel Church of Fairfield Parade, GL53 7PJ and the Vicar, Revd Ken Shill.

DATA PROTECTION PRINCIPLES

When processing your information, we must comply with the six enforceable principles of good practice. These provide that your personal data must be:

- processed lawfully, fairly and in a transparent manner,
- processed for specified, explicit and legitimate purposes,
- adequate, relevant and limited to what is necessary,
- accurate and kept up-to-date,
- kept for no longer than is necessary, and
- processed in a manner than ensures appropriate security.

INFORMATION YOU GIVE TO US

You may give us information (such as your name, address, email address, phone number, medical information, special needs, children's names, date of birth or emergency contact details) by:

- filling in forms on our headed notepaper or on our website,
- participating in church services or other community groups that we organise,
- corresponding with us by phone, email, letters or otherwise.

We may use the information you give to us for a number of different purposes. For each purpose, we are required to confirm the 'legal basis' that allows us to use your information, as follows:

Purposes for which we will use the information you give to us	Legal basis
To publish and store the Electoral roll.	It will be necessary for us to comply with a legal obligation to which we are subject under <i>Electoral Registration and Administration Act 2013</i> .
To store PCC minutes and correspondence.	It will be necessary for us to comply with a legal obligation to which we are subject under the <i>Church of England (Miscellaneous Provisions) Measure 1992</i> .
To book meeting rooms and administer payment and use of the same.	It will be necessary for the performance of the contract between you and us.
To publicise events using information already in the public domain.	It will be necessary for our legitimate interests, namely our mission work as a Christian church.
To contact the PCC members to arrange meetings, circulate agendas, meeting minutes and other correspondence.	It will be necessary for our legitimate interests, namely running a successful and accountable church.
To keep a record of which relevant persons have been DBS checked and when.	It will be necessary for our legitimate interests, namely safeguarding children and vulnerable adults with whom we come into contact, to maintain an up-to-date record of individuals' current clearance status.
To administer and run our "Lighthouse" provision, Creative Church and other children and youth work, and for use in the event of an emergency.	We will only do this if you (and where relevant, your children) give us consent by some specific, informed and unambiguous method.
To organise and run our community interest groups such as Emmanuel Fellowship, Community Coffee Café and the like.	We will only do this if you give us your consent by some specific, informed and unambiguous method.
To invite you to services, church-run sessions and events that you have attended in previous years or that we reasonably deem may be of interest to you.	We will only do this if you give us your consent by some specific, informed and unambiguous method.
To keep a record of Gift Aid contributors in order to claim the Gift Aid tax rebate.	We will only do this if you give us your consent by some specific, informed and unambiguous method.

As stated in the table above, it is a legal obligation for you to provide us with certain information. If you do not provide us with that information, we may be unable to comply with our legal obligations as a church

It is also a contractual requirement for you to provide us with certain information. If you do not provide us with that information, we may not be able to provide you with some or all or the contractual services.

All other information you give us is given entirely at your discretion.

INFORMATION WE COLLECT ABOUT YOU FROM OTHER SOURCES

We may be passed your details by St Philips and St James' Church in respect of your registered interest in a church-run children's holiday club.

We may also collect information about you by conducting searches of public records (eg. electoral roll), or in the process of confirming your identity.

We may use the information we collect about you for a number of different purposes. For each purpose, we are required to confirm the 'legal basis' that allows us to use your information, as follows:

Purposes for which we will process the information	Legal basis for the processing
To obtain further information about you, any organisation you represent, with a view to us entering into a contract with you or the organisation you represent.	It will be necessary for our legitimate business interests to ensure we are fully aware of all issues relating to the matter that is the subject of the legal services you have requested from us.
To keep you informed as to the dates and arrangements of a children's holiday club.	You will have given St Philip and St James' Church consent by some specific, informed and unambiguous method to pass your details to us.

You can change the settings on your internet browser to restrict the amount of information that we can collect when you visit our website. If you do not allow us to collect this information, then we may be unable to offer you the best experience possible when accessing and using our website.

'SPECIAL CATEGORY' DATA

Special category data means data relation to people's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, criminal convictions, sex life or sexual orientation, or certain types of genetic or biometric data. Where you choose to make us aware of special category data, we will always respect your privacy and will not record such information unless you specifically ask us to.

DISCLOSURE OF YOUR INFORMATION

You agree that we have the right to share your personal information with:

- the Diocese of Gloucester;

- our auditors and quality assurance assessors;

We will disclose your personal information to third parties:

- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply any contract between you or us, or our website terms of use, or to protect the rights, property, or safety of you, our parishioners, or others.

WHERE WE STORE YOUR PERSONAL DATA

All information you provide to us is stored on our secure servers in the United Kingdom.

We will take all steps reasonably necessary to ensure that your data is treated securely, including taking the following safeguards:

- **Entry controls.** The church office is kept locked when not in use.
- **Secure lockable desks and cupboards.** Desks and cupboards are kept locked when not in use if they hold confidential information of any kind.
- **Methods of disposal.** Paper documents are disposed of by shredding in a manner that ensures confidentiality.
- **Equipment.** Our internal policies require that individual monitors do not show confidential information to passers-by and that users lock or log-off from their computer when it is unattended.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

HOW LONG WE WILL STORE YOUR PERSONAL DATA

The length of time that we will store your data will depend on the 'legal basis' for why we are using that data, as follows:

Legal basis	Length of time
Where we use/store your data because it is necessary for the performance of the contract between you and us	We will use/store your data for as long as it is necessary for the performance of the contract between you and us
Where we use/store your data because it is necessary for us to comply with a legal obligation to which we are subject	We will use/store your data for as long as it is necessary for us to comply with our legal obligations
Where we use/store your data because it is necessary for our legitimate business interests	We will use/store your data until you ask us to stop. If we can demonstrate, however, the reason why we are using/storing your data overrides your interests, rights and freedoms,

	then we will continue to use and store your data for as long as it is necessary for the performance of the contract between you and us (or, if earlier, we no longer have a legitimate interest in using/storing your data)
Where we use/store your data because you have given us your specific, informed and unambiguous consent	We will use/store your data until you ask us to stop

YOUR RIGHTS

You have various legal rights in relation to the information you give us, or which we collect about you, as follows:

- You have a right to access the information we hold about you free-of-charge, together with various information about why and how we are using your information, to whom we may have disclosed that information, from where we originally obtained the information and for how long we will use your information.
- You have the right to ask us to rectify any information we hold about you that is inaccurate or incomplete.
- You have the right to ask us to erase the information we hold about you (the ‘right to be forgotten’). Please note that this right can only be exercised in certain circumstances and, if you ask us to erase your information and we are unable to do so, we will explain why not.
- You have the right to ask us to stop using your information where: (i) the information we hold about you is inaccurate; (ii) we are unlawfully using your information; (iii) we no longer need to use the information; or (iv) we do not have a legitimate reason to use the information. Please note that we may continue to store your information or use your information for the purpose of legal proceedings or for protecting the rights of any other person.
- You have the right to ask us to transmit the information we hold about you to another person or company in a structured, commonly-used and machine-readable format. Please note that this right can only be exercised in certain circumstances and, if you ask us to transmit your information and we are unable to do so, we will explain why not.
- Where we use/store your information because it is necessary for our legitimate business interests, you have the right to object to us using/storing your information. We will stop using/storing your information unless we can demonstrate why we believe we have a legitimate business interest which overrides your interests, rights and freedoms.
- Where we use/store your data because you have given us your specific, informed and unambiguous consent, you have the right to withdraw your consent at any time.
- You have the right to object to us using/storing your information for direct marketing purposes.

If you wish to exercise any of your legal rights, please contact Sharon Wallington by writing to the address at the top of this policy, or by emailing us at Emmanuel.church@btconnect.com.

You also have the right, at any time, to lodge a complaint with the Information Commissioner's Office if you believe we are not complying with the laws and regulations relating to the use/storage of the information you give us, or that we collect about you.

AUTOMATED DECISION-MAKING

We do not use automated decision-making processes.

CHANGES TO OUR POLICY

Any changes we make to our policy in the future will be posted on our website and, where appropriate, notified to you by post, email or via social media. Please check our website frequently to see any updates or changes to our policy.

CONTACT

Questions, comments and requests regarding this policy are welcomed and should be addressed to Sharon Wallington by writing to the address at the top of this policy, or by emailing us at Emmanuel.church@btconnect.com.