



Stantonbury Ecumenical Partnership General Privacy Notice and Data Request Procedures

Scope

This document explains the legal basis for holding and processing personal data in the Partnership. It covers:

- Your personal data – what is it?
- Who are the data controllers?
- What personal data is processed
- How personal data is processed
- The legal basis for processing personal data
- Sharing your personal data
- Your rights and your personal data
- Transfer of data abroad
- Further processing
- Contact details

Appendix A explains the Data Request procedures in terms of

- Receipt of data request
- Collation and review of the data
- Release of information
- Data retention

This policy was adopted from Churches Together in Milton Keynes.

Who it applies to

Any of the Partnership's members, including staff, trustees and volunteers and any other individual on whom the Partnership holds personal data.

Date of approval _October 2023_____

Review date ____October 2026_____

Stantonbury Ecumenical Partnership (SEP) GENERAL 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 Trustees of the SEP who are the data controllers for your data.

The SEP has a number of links to various bodies:

- Representatives and governing bodies of the five sponsoring denominations.
- Local Ecumenical Partnerships
- Churches together groups
- Individual churches not part of the Ecumenical system

As the SEP is made up of all of these persons and organisations working together, we may need to share personal data we hold with them so that they can carry out their responsibilities to the SEP and our community. The organisations referred to above are joint data controllers. This means we are all responsible to you for how we process your data.

Each of the data controllers have their own tasks within the SEP 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 trustees on our own behalf and on behalf of each of these data controllers. 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;
- 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 dependents;

- Where you make donations or pay for activities such as attendance at courses, 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 Christian organisation, 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, 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.
- 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.
- To deliver the SEP'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 fundraise and promote the interests of the SEP.
- To maintain our own accounts and records;
- To process any donations that you have made (including Gift Aid information);
- To seek your views or comments;
- To notify you of changes to our courses, events and role holders;
- To send you communications which you have requested and that may be of interest to you. These may include information about campaigns, appeals, 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 as specified in our constitution;

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 associated

with the SEP). 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 may be necessary for compliance with a legal obligation. For example, the investigation or prevention of crime.

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 leading or participating in courses run by us.

As a not-for-profit body with a political, philosophical, religious or trade union aim, the regulations allow us to process information concerning religious belief and other sensitive data, provided: -

- the processing relates only to members or former members (or those who have regular contact with it in connection with those purposes); and
- there is no disclosure to a third party without consent.

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

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 associated with the SEP 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;
- On occasion, other organisations with which we are carrying out joint events or activities. **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.

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 administration 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 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).
7. The right to object to the processing of personal data where applicable.
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.

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:

Stantonbury Ecumenical Partnership – Christ Church Stantonbury, Purbeck,
Stantonbury Campus, MK14 6GU.

Appendix A

Procedure for Requesting Copy of Personal Data

1) Receipt of Data Request

Data requests should be made in writing. This may be posted or delivered by email. The identity of the requester may need to be established and consent ensured if this is on behalf of a 3rd party. All requests should be recorded and logged by the Chair of Trustees.

A reply should be sent to the requester to acknowledge receipt of the request. There is no charge unless the request is unduly complicated or multiple copies of the data are required. The request should be dealt with within one calendar month.

2) Collation and review of the data

Data should be reviewed to ensure that it does not contain the personal data of other individuals. All personal information of other individuals will be redacted, as it is not relevant. Requesters should be informed if information has been redacted. Data should not be released if its release would prejudice any criminal or disciplinary investigation.

3) Release of information

When the information is ready, the requester should be informed and the information passed either in person or by signed for mail or by electronic copy in the form of encrypted pdf

4) Data retention

Information collated after a data request should be retained for 12 months from the last time it was requested and the data as a whole should be retained according to the data retention schedule.