

# DATA PROTECTION POLICY

## The Parochial Church Council (PCC) of St. Mark's Forest Gate

### 1. Definition of personal data

Personal data is information about a living individual who can be identified from that information, such as a name, address, phone number or email address. Identification can be by the information alone or in conjunction with any other information that the PCC of St. Mark's Forest Gate possesses or is likely to possess.

### 2. The Data Controller

The Data Controller is the Parochial Church Council of St. Mark's Forest Gate, St. Mark's Church, Lorne Road London E7 0LJ. Tel: 07824 859075. Email: [gdpr@stmarksforestgate.org.uk](mailto:gdpr@stmarksforestgate.org.uk).

### 3. How the PCC of St. Mark's Forest Gate protects personal data

The PCC of St. Mark's Forest Gate complies with its obligations under the GDPR by:

- Keeping personal data up to date;
  - Members are regularly asked to report any changes in their personal details
- Storing, accessing and destroying data securely;
  - Paper records are securely locked away, and when being used must not be left visible to others or unattended at any time;
  - Electronic records are password protected, with the passwords being issued and stored securely in password-protected accounts on devices with up to date antivirus protection;
  - Records may not be copied under any circumstances, either by hand or electronically;
  - After the death of a member, their data is destroyed securely within three months
  - Where a member withdraws their consent, no further contact is made with immediate effect, and their data is securely destroyed within three months.
- Collecting and retaining only the minimum amount of data necessary for us to carry out our service to our members;
- Sharing data only where necessary in accordance with the aims of the UA, and only with the express consent of our members, which may be withdrawn at any time;
- Existing members were asked to give their consent in May 2018 and new members will be asked to give their consent as they join. At the same time as giving consent, members are shown how to withdraw their consent, by contacting Mike Richardson at St. Mark's, [gdpr@stmarksforestgate.org.uk](mailto:gdpr@stmarksforestgate.org.uk). A copy of our Data Privacy Notice is provided to all members and is available for viewing and download on our website.
- Appropriate technical measures to protect personal data from loss, misuse, unauthorised access and disclosure;
  - All data handlers have been trained in the necessary measures
  - All data handlers must have their own individual email accounts, password-protected on all devices on which they access it, and the account must not be accessible by any third party
  - Emails carry a signature that says the information contained therein is confidential to the intended recipient; that it should not be forwarded and that if it is received in error that it should be deleted immediately. This will be necessary – I can help with this if required, although you may already have something in place which complies

### 4. How the PCC of St. Mark's Forest Gate processes personal data

The PCC of St. Mark's Forest Gate processes members' data through having a legitimate interest to do so:

- To enable us to provide a voluntary service for the benefit of our members;
- To administer membership records;

- To fundraise and promote the mission of St. Mark's Forest Gate;
- To manage our employees and volunteers;
- To maintain our own statutory accounts and records (including the processing of Gift Aid applications);
- To inform members of news, events, activities and services at St. Mark's;
- To provide statistical information about St. Mark's to the Diocese of Chelmsford – this information consists purely of numbers and does not include names, addresses or any other details you have given us, except in the case of elected members, i.e. the Churchwardens and the members of the PCC, including co-opted members.

## **5. Legal compliance for processing personal data**

- Members give explicit consent on an opt-in basis so that we can keep them informed about news, events, activities and services, and process Gift Aid and other donations.
- Processing is necessary for carrying out obligations under employment, social security, safeguarding or social protection law, or a collective agreement;
- Processing is carried out by us as a not-for-profit body 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.
- An audit has been completed to establish the nature of the data we collect and this informs our use of it;
- Where photographs are taken this will be announced the start of the relevant event, and people present will be given the opportunity to refuse consent. Any photo displayed will be removed immediately if someone who appears in it asks us to do so.
- If data is collected at Open Days, we will make clear how it will be used and show that it is in accordance with the GDPR.
- Wherever possible, data shared with an external auditor examining our accounts at the end of each financial year will be anonymised. If this is not possible, a data sharing agreement will be sought.

## **6. Sharing personal data**

Personal data will be treated as strictly confidential and will only be shared with other members of St. Mark's in order to carry out a service to other members of the church, e.g. preparing rotas, or for purposes connected with it. We will not normally share data with third parties outside St. Mark's, and if we do so, this will only be with members' consent.

## **7. Social Media**

For Facebook, Instagram, Twitter and YouTube, members' data privacy agreement is with these companies and not the PCC of St. Mark's Forest Gate. However, we use these media strictly in accordance with their terms and conditions and never use or share any information about members that we may receive through their use of them.

## **8. Retention of personal data**

We retain membership data while it is still current, and Gift Aid declarations and associated paperwork for up to six years after the calendar year to which they relate.

## **9. Members' rights regarding their personal data**

Members are explicitly made aware when giving consent that unless subject to an exemption under the GDPR, they have the following rights with respect to their personal data:

- The right to request a copy of their personal data which the PCC of St. Mark's Forest Gate holds;

- The right to request that the PCC of St. Mark's Forest Gate corrects any personal data if it is found to be inaccurate or out of date;
- The right to request that personal data is erased where it is no longer necessary for the PCC of St. Mark's Forest Gate to retain it;
- The right to withdraw consent to the processing at any time;
- The right to request that the Data Controller provides them with their personal data and where possible, to transmit that data directly to another Data Controller, (the right to data portability), where applicable;
- The right, where there is a dispute in relation to the accuracy or processing of personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable);
- The right to lodge a complaint with the Information Commissioner's Office.
  - Members are provided with the relevant contact details

#### **10. Further processing**

If we wish to use personal data for a new purpose not covered by this Data Privacy Notice, then we will provide members with a new notice explaining the new use before starting the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek prior consent to the new processing.

#### **11. In case of breach**

In case of a breach of the General Data Protection Regulation, we will report the circumstances to the Information Commissioner's Office within 72 hours.

This Data Protection Policy has been agreed by the PCC of St. Mark's Forest Gate, who will review it by 30<sup>th</sup> June 2023.