



## DATA PRIVACY NOTICE

### The Parochial Church Council (PCC) of St Peter's, Great Berkhamsted

This document summarises how the PCC holds and processes personal data in accordance with the General Data Processing Regulation and your associated rights. The PCC decides what personal data it collects, for what purposes, and how it is processed – the PCC is the “Data Controller”. You - the person to whom data relates - are referred to as a “Data Subject”.

#### 1. What is Personal Data?

Personal data is any data which identifies you, either on its own or together with other information. The PCC only collects data about you, from you. It does not obtain any data about you from any other source.

The GDPR recognises data about religious beliefs, and data concerning health, as special categories of information, and this is taken into account where relevant below.

#### 2. What is the lawful bases for the PCC to process personal data?

The PCC is required to identify the legal bases for processing personal data under the GDPR. It is lawful for the PCC to process personal data for one or more of the following reasons:

- a) To perform or create contracts.
- b) To comply with its legal obligations.
- c) To pursue the PCC's legitimate interests.

As the PCC is a not-for-profit body with religious aims it is also lawful, where relevant, for the PCC to process information about religious beliefs:

- d) provided the processing relates only to church members or former members (or those who have regular contact with it in connection with its purposes) and provided there is no disclosure to a third party without consent, or if
- e) that personal data is manifestly made public by the data subject.

The PCC may lawfully process data necessary for reasons of public interest in the area of public health.

#### 4. What processing principles must the PCC comply with?

The PCC must comply with some general principles. It must:

- a) Use personal data only for the legitimate purposes which it has declared to you.
- b) Keep personal data up to date;
- c) Collect, store, process and, when appropriate, destroy data securely.
- d) Not collect or retain excessive amounts of data.
- e) Protecting personal data from loss, misuse, unauthorised access and disclosure.

#### 5. Why does the PCC process personal data?

The PCC processes personal data to further its legitimate charitable purposes. In particular, it uses personal data to:

- a) Administer church membership records, such as the Church Electoral Roll.

- b) Manage and support PCC employees and church volunteers who contribute to every aspect of church life and worship.
- c) To offer pastoral care to church members and the wider community.
- d) Maintain the financial accounts and records of the charity, including the processing of gift aid applications, maintaining Trustee accounts and reports, paying suppliers and reimbursing expenses incurred by church members.
- e) Operate and manage the Church to fulfill its charitable purposes in compliance with charity and church law, and to protect and promote our church heritage.
- f) Communicate with members of the church as appropriate to inform you of news, events, activities and services running at St Peter's.
- g) Distribute the "your Berkhamsted" magazine to subscribers.
- h) Provide pastoral activities and services such as children's' activities, clubs, baptisms, weddings and funerals;
- i) Plan and offer a full range of Christian church services, possibly accompanied by church bells and church music, to enrich all our worship at St Peter's;
- j) Comply with the law and best practice to care for and safeguard all members of the church community and visitors.
- k) Support the National Health Service Test and Trace procedures to combat the Covid-19 pandemic.

The PCC does not use any personal data for automatic profiling of individuals.

#### **6. Does the PCC share your data with anyone else?**

Your personal data is treated as confidential. It will only be disclosed to other people to fulfil legitimate purposes connected with the church.

In particular, the PCC will disclose personal data, limited to what is appropriate and necessary, to:

- a) Financial service providers such as banks (for executing personal payments such as expense reimbursements), employee pension schemes, and HMRC (for processing employment taxes and Gift Aid).
- b) Other members of the church, including but not limited to those on the Church Electoral Roll, to facilitate church life and the full involvement of all church members.
- c) Certain people outside of the regular church community such as people who distribute the parish magazine, "your Berkhamsted".
- d) The Diocese of St Albans.
- e) Members of the church working with children and other vulnerable people in order effectively to discharge the PCC's safeguarding responsibilities;
- f) Service providers such as Funeral Directors.
- g) The National Health Service Covid-19 Test and Trace.

The PCC will never sell or provide your information to other organisations.

**Please note** that in the course of normal church life the PCC will communicate and share data with you and others using emails. The PCC is not responsible for how email data is managed outside of PCC control.

#### **7. How long do we keep your personal data?**

The PCC will keep personal data in accordance with the guidance set out in "Keep or Bin: Care

of Your Parish Records" which is available from the Church of England website<sup>1</sup>. Specifically, the PCC will retain:

- a) Electoral roll data while it is current.
- b) Gift aid declarations and associated paperwork, and financial records for a minimum of 7 years after the calendar year to which they relate.
- c) Parish registers (baptisms, marriages, funerals) permanently.
- d) Other records for as long as it is relevant to the life of the church and its legitimate charitable purposes.

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

Under the GDPR, you have the following general rights with respect to your personal data:

- a) To request a copy of your personal data which the PCC holds about you.
- b) To request that the PCC corrects personal data found to be inaccurate or out of date.
- c) To request your personal data is erased securely where it is no longer necessary for the PCC to retain that data.
- d) To request that the PCC stop processing your data.
- e) To request that the PCC provide you with a copy of your personal data and, where possible, to transmit that data directly to another data controller, (known as the right to data portability).
- f) 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.
- g) To object to the processing of personal data, (where applicable).
- h) To lodge a complaint with the Information Commissioners Office.

## **9. Further processing**

If we wish to use your personal data for a new purpose not covered by this Data Privacy Notice, then we will provide you with a new notice explaining the changes before the new processing starts.

## **10. Review and update of this Privacy Notice**

The PCC will review this Privacy Notice and GDPR compliance annually.

## **11. Contact Details**

To exercise all relevant rights, queries or complaints in the first instance please contact the Parish Administrator at [churchoffice@greatberkhamsted.org.uk](mailto:churchoffice@greatberkhamsted.org.uk) 01442 878227

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.

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<sup>1</sup> Details about retention periods can currently be found in the Record Management Guides on the Church of England website at: - <https://www.churchofengland.org/about-us/structure/churchcommissioners/administration/librariesandarchives/recordsmanagementguides.aspx>