

EMMANUEL CHURCH WIMBLEDON PRIVACY NOTICE

This Privacy Notice describes the way that we, Emmanuel Church Wimbledon (“**ECW**”), as a controller use your personal data.

ECW is a Proprietary Chapel within the Church of England. 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. These include:

- The incumbent of ECW (that is, our Minister) and other staff;
- The elders, trustees and treasurer of ECW;
- the bishops of the Diocese of Southwark;

As the Church is made up of all of these persons and organisations working together, we may need to share personal data we hold (such as the names and addresses on our electoral roll) with them so that they can carry out their responsibilities to the Church and our community (such as the names and addresses on our electoral roll).

Our church is constituted as a charitable company limited by guarantee named Emmanuel Church Wimbledon (charity number 1146577). The company is accountable for the finances of the church, our Safeguarding and other legal and administrative matters.

The Diocese of Southwark has its own tasks within the Church of England. You will need to refer to their respective privacy notices to understand how they may use your personal data. The website for the Diocese of Southwark can be found here: <https://southwark.anglican.org/>.

A description of what personal data we process and for what purpose is set out in this Privacy Notice. This Privacy Notice is provided to you by ECW on our own behalf and on behalf of each of the organisations listed above to the extent we share your personal data with them. In the rest of this Privacy Notice, we use the word “we” to refer to ECW.

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1. A few definitions

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 Act 2018, 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.

What is a controller?

The entity that determines the purposes and means of the processing of personal data.

2. What personal data do we process?

We will process some or all of the following where necessary to perform our 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 dependants;
- Where you make donations or pay for activities such as weekends away, financial identifiers such as bank account numbers, payment card numbers, payment/transaction identifiers, policy numbers, and claim numbers; and
- The data we process is likely to constitute special category 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 special category 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.

We will usually have your personal data because you have directly given it to us. You are under no obligation to provide us with your personal data though if you choose not to, we may not be able to contact you or tell you about our activities. We may additionally obtain your personal data from other members of the church community.

3. Why do we process your personal data?

We will comply with our legal obligations to keep personal data up to date; to store and destroy it securely; to not collect or retain excessive amounts of personal data; to keep personal data secure, and to protect personal data from loss, misuse, unauthorised access and disclosure and to ensure that appropriate technical and organisational 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 (which include maintaining and publishing our electoral roll in accordance with the Church Representation Rules);
- To enable us to provide a Christian witness for the benefit of the community of Wimbledon and beyond;
- 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 (such as visiting you when you are gravely ill or bereaved) and to organise and perform ecclesiastical services for you, such as baptisms, 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 controller;
- To administer the parish, deanery, archdeaconry and diocesan membership records and to provide a church directory to facilitate church members communicating with one another;
- To protect the rights and interests of the Church or to protect third party's rights and interests where necessary;
- To fundraise and promote the interests of the Church and ECW;
- To maintain our own accounts and records;
- To process a donation that you have made (including Gift Aid information);
- To seek your views or comments;
- To notify you of changes to our services, 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 weekly church activities, campaigns, events, appeals, other fundraising activities and services relating to or provided through the Church;
- To manage our employees and volunteers
- To process an application for a role at ECW; and
- To enable us to provide a voluntary service for the benefit of the public in a particular geographical area as specified in our constitution.

4. 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 Rule to administer and publish the electoral roll.

We may also process personal 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 personal data in connection with the hire of church facilities.

We will obtain your consent where we are required by law, for instance, when sending email communications to you about our activities. You always have the right to revoke your consent.

5. What about more sensitive data?

Certain personal data is considered more sensitive. The law refers to this data as special category data. This includes personal data revealing religious beliefs, data concerning health, race and ethnic origin.

Religious organisations are permitted to process information about your religious beliefs to administer membership or contact details, provided they process that information in accordance within the restrictions set out in the GDPR.

Otherwise we will usually obtain your explicit consent to the use of your special category data unless there is another substantial public interest that we can rely on to use your personal data e.g. complying with our safeguarding obligations.

6. 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 and responsibilities, where we are legally required to share your personal data, where we share your personal data to protect ECW or an individual, or where you first give us your prior consent. It is likely that we will need to share your personal data with some or all of the following (but only where necessary):

- The appropriate bodies of the Church of England including the other controllers identified above;
- Our agents, servants and contractors, for example, we may ask a commercial provider to maintain our database software e.g. ChurchSuite;
- Other clergy or lay persons nominated or licensed by the bishops of the Diocese of Southwark to support the mission of the Church in our parish, for example, our clergy are supported by our area 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 as well as clergy and lay persons involved in any of our church plants who may participate in our mission in support of our regular clergy;
- Other persons or organisations operating within the Diocese of Southwark including, where relevant, the Southwark Diocesan Board of Education and Subsidiary Bodies and, on occasion, other churches with which we are carrying out joint events or activities;

- Third parties for the purpose of getting advice to support the activities of the organisation e.g. professional advice, legal advice;
- External agencies and regulators such as HMRC for the processing of Gift Aid claims;
- Other regulatory and governmental bodies including the police if there is any risk to the safety or welfare of a child or other vulnerable person or if we are legally required to provide the information.

7. How long do we keep your personal data?

We will retain certain records according to regulatory and statutory responsibilities as well as to comply with guidance on records management from the Church of England (see: <https://www.churchofengland.org/more/libraries-and-archives/records-management-guides>). We may keep 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 after the date of the transaction to support HMRC audits. We are required to keep church registers (baptisms, marriages and funerals) permanently. In general, we will endeavour to keep personal data only for as long as we need it. This means that we may delete it when it is no longer needed.

8. 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.

The right to access personal data we hold on you

At any point you can contact us to request the personal data we hold on you as well as why we have that personal data, who has access to the information and where we obtained the personal data from. Once we have received your request we will endeavour to respond within one month.

There are no fees or charges for the first request but additional requests for the same personal data may be subject to an administrative fee.

The right to correct and update the personal data we hold on you

If the personal data we hold on you is out of date, incomplete or incorrect, you can inform us and your personal data will be updated.

The right to have your personal data erased

If you feel that we should no longer be using your personal data or that we are illegally using your personal data, you can request that we erase the personal 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)).

The right to object to processing of your personal data

You have the right to request that we stop processing your personal 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 personal data. Even after you exercise your right to object, we may continue to hold your personal data to comply with your other rights or to bring or defend legal claims.

The right to restriction of your personal data

You have the right to ask us to restrict our use of your personal data in certain specific circumstances e.g. if there is a dispute about the accuracy of your personal data.

The right to data portability

You have the right to request that we transfer some of your personal data to another controller in certain circumstances. We will comply with your request, where it is feasible to do so, within one month of receiving your request.

The right to withdraw your consent to the processing at any time for any processing of personal data to which consent was sought.

You can withdraw your consent easily by telephone, email, or by post (see Contact Details below).

The right to complain to the Information Commissioner's Office.

9. Transfer of Data Abroad

Any personal data transferred to countries or territories outside the UK or the EU will only be transferred where we have put in place appropriate safeguards to protect your personal data usually through contracts approved by the European Commission. Please contact us if you have any questions about the mechanisms we put in place to protect any personal data being transferred overseas.

10. Further processing

If we wish to use your personal data for a new purpose, not covered by this Privacy 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.

11. Changes to this Privacy Notice

We keep this Privacy Notice under regular review and we will place any updates on our website <https://www.emmanuelwimbledon.org.uk/User/PrivacyPolicy.aspx>

If we make a significant change, we will use reasonable efforts to notify you. This Privacy Notice was last updated in August 2020.

12. 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:

Church Manager, Emmanuel Church, 24 Ridgway, Wimbledon, Greater London, SW19 4QN.

Email: hello@emmanuelwimbldeon.org.uk

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.

13. Use of Cookies

A cookie consists of information sent by a web server to a web browser, and stored by the browser. The information is then sent back to the server each time the browser requests a page from the server. This enables the web server to identify and track the web browser. We may use "session" cookies on the website. We will use the session cookies to: keep track of you whilst you navigate the website. Session cookies will be deleted from your computer when you close your browser. We use Google Analytics to analyse the use of this website. Google Analytics generates statistical and other information about website use by means of cookies, which are stored on users' computers. The information generated relating to our website is used to create reports about the use of the website. Google will store this information. Google's privacy policy is available at: <http://www.google.com/privacypolicy.html>. Most browsers allow you to reject all cookies, whilst some browsers allow you to reject just third party cookies. For example, in Internet Explorer you can refuse all cookies by clicking "Tools", "Internet Options", "Privacy", and selecting "Block all cookies" using the sliding selector. Blocking all cookies will, however, have a negative impact upon the usability of many websites.