

LIMPENHOE, SOUTHWOOD & CANTLEY PCC

PRIVACY NOTICE INCLUDING GENERAL DATA PROTECTION REGULATION POLICY

Summary

Our commitment to your privacy

Your trust is important to us. We want you to know that we have a Privacy Notice to explain how we collect, store and handle your personal data.

Why we collect your data

There are a limited number of occasions, such as Gift Aid or the maintaining of the electoral roll when we are required collect personal information. We treat your data with the utmost care and take steps to protect it.

When we share your data

We sometimes share your data with third parties, for example HMRC or the Church of England. We will never sell your data to a third party. Use of your data is only used by Limpenhoe, Southwood & Cantley PCC to enable us to carry out our legal responsibilities.

Know your rights

You have rights regarding your personal data including seeing what data we access and updating or removing your information. You also have the right to appeal to the Information Commissioner if you feel we are mishandling your data.

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GENERAL DATA PROTECTION REGULATION POLICY

1. Introduction

This Policy aims to outline the types of data, methods of data collection, and use of Personal Data in accordance with rules, regulations and recommendations of the Information Commissioner's Office (ICO), General Data Protection Regulation (GDPR), and Data Protection Act of 1998. The policy will come into force on 27 May 2018 led by Limpenhoe, Southwood & Cantley PCC and Mike Brook as Data Processor.

- A controller determines the purposes and means of processing personal data.
- A processor is responsible for processing personal data on behalf of a controller

As a processor, Mike Brook will be required to maintain records of personal data and processing activities as well as will have legal liability if you are responsible for a breach.

2. Data Type and Collection

The ICO outline two types of data in the GDPR:

Personal Data

The Information Commissioner's Office define personal data as: "Any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier." This definition provides for a wide range of personal identifiers to constitute personal data, including name, identification number, location data or online identifier, reflecting changes in technology and the way organisations collect information about people.

For the avoidance of doubt, the Personal Data that we collect and hold is:

- Gift aid declarations
- Electoral Roll
- Visitor book entries
- Email addresses of PCC members
- Baptismal Register Entries

Sensitive Personal Data

The GDPR refers to sensitive personal data as "special categories of personal data" The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual.

Your use of St Botolph's Church Limpenhoe, or St Margaret's Cantley may reveal your religious beliefs but this is not recorded or shared with any third party.

Personal and Sensitive Data that we will not ask for, hold or share with 3rd parties:

- Health related data i.e. Blood Type or Medication
- Sexuality
- Passwords / passcodes for any personal or professional accounts

For the avoidance of doubt this type of data is not collected or held or therefore applicable to Limpenhoe PCC.

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3. Use of Personal Data

The use of Personal Data by Limpenhoe, Southwood & Cantley PCC is limited and used only when visitors (members of the congregation) or others have provided their personal information.

Members of Limpenhoe, Southwood & Cantley PCC have a legitimate interest in the running of Limpenhoe, Southwood & Cantley PCC and have given implied consent to Limpenhoe, Southwood & Cantley PCC using their personal data and sharing with third parties where necessary.

4. Data Sharing

Data sharing by Limpenhoe, Southwood & Cantley PCC is limited and only shared where “implied” consent has been given.

Example

A visitor completes a Gift Aid declaration envelope in the Church enabling Limpenhoe, Southwood & Cantley PCC to reclaim basic rate tax from HMRC. The Gift Aid declaration is entered onto a spreadsheet a summary of which is passed via the data controller to HMRC.

5. Data Storage

The GDPR applies to both automated personal data (held on computer) and to manual filing systems where personal data are accessible according to specific criteria. This includes chronologically ordered sets of manual records containing personal data. Each method of data storage carries a risk assessment and will be audited.

Individuals wishing to access the data held by Limpenhoe, Southwood & Cantley PCC should contact Mike Brook mike.j.brook@btinternet.com or telephone 01493 700 259.

6. Breach of Data Protocol

The GDPR defines a breach of data as “A personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. This includes breaches that are the result of both accidental and deliberate causes. It also means that a breach is more than just about losing personal data.”

A personal data breach can include, but is not limited to:

- Access by an unauthorised third party
- Deliberate or accidental action (or inaction) by a controller or processor
- Sending personal data to an incorrect recipient
- Computing devices containing personal data being lost or stolen
- Alteration of personal data without permission
- Loss of availability of personal data

We will inform the person(s) without delay, verbally then in writing, and the incident will be documented.

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Should the breach pose risk to the persons' rights and freedoms, we will notify the ICO within 72 hours. An assessment will be made whether to inform a third party, i.e. the police or bank based on the severity of the incident. A risk assessment will be carried out to identify whether or not the breach was a result of human error or a systemic issue and how the incident can be prevented in future.

7. Privacy Notice

A copy of the Data Protection policy will be made available on the church notice board.

We will make clear on our website that we are committed to protecting client data and have a policy in place to support this.

8. Data Retention

- We have the right to retain any data for seven (7) years before destroying it. After this time all data will be destroyed.

9. Compliance

Individuals have the right to appeal to the Information Commissioner if they feel Limpenhoe, Southwood & Cantley PCC are mishandling data. Individuals wishing to do so should contact Mike Brook mike.j.brook@btinternet.com or telephone 01493 700 259.

Annual audits to ensure we are not holding incorrect or unnecessary data, this includes but is not limited to, home addresses, telephone numbers, across both digital and paper storage systems.

This Policy is due for review in July 2019.

Limpenhoe, Southwood & Cantley PCC
25 May 2018