### **Purpose**

We are committed to protecting the personal data and respecting the rights of the people whose personal data we collect and use. We value the personal information entrusted to us and we respect that trust by complying with all relevant laws and adopting good practice to ensure it is not misused in any way.

### Scope

This policy covers how we will process, use and store your data, what data we hold, your individual rights and how you can interact with us about your data which is obtained by means of written, electronic and voice recordings but excludes all verbal conversation. SWoLC is the Data Controller.

This policy covers our use of personal data, which is any information about a living individual, which allows them to be identified from that data. Identification can be by the information alone or in conjunction with any other information.

Our processing of personal data is governed by the relevant UK legislation.

## How is your data is processed and used?

SWOLC processes and uses the data including:

- Names, titles, and aliases.
- Contact information including telephone numbers, postal /residential addresses, and email addresses.
- Where there is a legitimate interest to facilitate our charitable aims and activities, or where you have provided them to us, we may process demographic information such as gender, age, date of birth, marital status, nationality, and dependants.
- Where you give financially in support of SWOLC or pay for church activities (event bookings, etc.). However, it should be noted that certain data eg financial information and Gift Aid is restricted to certain individuals only.
- As a church the data we process is likely to constitute sensitive personal data because the very fact that we process your data at all may be suggestive of your religious beliefs.
- To enable pastoral and prayerful support by our Pastors.

As a Data Controller, our staff and volunteers 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. If you have any concerns about how your data is being used, please speak with our Data Protection Officer.

## What are we doing with your data?

We only hold data that either we are legally obliged to or that helps us fulfil our missional and charitable aims as a church. We are a membership organisation and good communication with our membership is an essential part of being church.

Therefore, we will hold and process data to:

- Enable us to meet all legal and statutory obligations.
- Comply with and facilitate our comprehensive safeguarding procedures (including due diligence and complaints handling) in accordance with best safeguarding practice with the aim of ensuring that all children and adults-at-risk are provided with safe environments.
- Deliver our Church's mission 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 our church.
- Administer our membership records.
- Enable us to follow up membership, course and event enquiries.
- Maintain our own accounts and records.
- Process and record financial donations that you have made (including Gift Aid information).
- Communicate with you about our services, events, meetings, mission and other matters which are relevant to you as part of our church community.

# What is our legal basis for processing your personal data?

Our legal basis is as follows:

- Most of our data is processed because it is necessary for our legitimate interests to
  enable our charitable and missional aims. For example, maintaining membership
  records, safeguarding children and adults at risk of abuse, recording our financial
  donations, and operating team rotas for the effective function of Sunday services or
  other groups.
- Some of our processing is necessary for compliance with a legal obligation.

  Retaining safeguarding records and Gift Aid declarations are examples of this.
- We may also process data if it is necessary for the performance of a contract with you, or to provide a direct service to you.
- As a religious organisation, we are permitted to process information about your religious beliefs to administer our membership.
- Outside CCTV footage will be stored securely and will only be accessible to those with authorisation.

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

# Will we share your data?

You can be reassured that we will treat your personal data as strictly confidential.

Data will only be shared with third parties where it is necessary for the performance of our tasks and where you first give us your prior consent.

# How long will we keep your personal data?

Our general rule is to keep data no longer than necessary. Where you continue to actively engage with our church services, activities and events, we will retain the appropriate data for you so that we can best serve your involvement. We operate an annual process of review where we assess who is actively engaging in church life and, where this is not the case, we will remove your data.

### Additionally:

- We will keep some records permanently if we are legally required to do so. For example, this covers wedding registers and some safeguarding records.
- We may keep some other records for an extended period. For example, it is current best practice to keep financial records for a minimum period of seven years to support HMRC audits.

### What are your rights regarding your personal data?

You have the following rights with respect to your personal data: When exercising any of the rights listed below, 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.

- You can contact us to request the information we hold about you.
- If the data we hold about you is out of date, incomplete or incorrect, you can inform us and your data will be updated.
- 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.
- 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.
- The right to withdraw your consent to the processing at any time for any processing of data to which consent was sought.
- The right to lodge a complaint with the Information Commissioner's Office.

#### **Further processing**

If we wish to use your personal data for a new purpose not covered by this policy, then we will provide you with a new policy prior to commencing the processing to explain this new use and set out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

#### **Contact details**

To exercise all relevant rights and queries or complaints please contact Nigel Holmes, our Data Protection Officer.

You may also contact the Information Commissioners Office on 0303 123 1113 or via <a href="mailto:emai

# **Versions**

This Policy should be reviewed annually.

Version		Prepared by	
1.0	Dec 2023	Nigel Holmes	Agreed by Elders and
	Data Protec-		Deacons
	tion		
<b>2.0</b> Nov 2024 Data		Richard Hassall	Combined Policy
Prote	ction & Privacy		