



## Data Privacy Notice

*Agreed by Trustees on 21 March 2018.*

*Updated on 5 April 2018, to be reviewed by Trustees on 27 June 2018.*

### 1. Your personal data – what is it?

Personal data relates to a living individual who can be identified from the data. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession.

The processing of personal data is governed by the General Data Protection Regulation (GDPR).

### 2. Emmanuel Bristol

Emmanuel Bristol is the Data Controller for the purposes of the GDPR on behalf of Emmanuel Bristol. This means they decide how your personal data is processed and for what purposes.

You can contact Emmanuel Bristol via email ([admin@emmanuelbristol.org.uk](mailto:admin@emmanuelbristol.org.uk)) with any concerns or queries.

### 3. Legal basis for processing your personal data

- Your explicit consent allows us to keep you informed about news, events, activities and services and processing gift aid donations.
- Processing personal data is carried out under the legitimate interest basis permitted for religious bodies under GDPR.
- Processing your data may be necessary for carrying out obligations under employment, social security or social protection law.
- To fulfil our contractual obligations to employees.

### 4. How do we process your personal data?

Emmanuel Bristol complies with its obligations under GDPR by keeping personal data up-to-date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

Emmanuel Bristol use your personal data for the following purposes:-

- For the day-to-day administration of the church including pastoral care and oversight, calls, email lists, visits and preparation of ministry rotas.
- Maintaining financial/giving records for financial and tax purposes.
- With your specific consent, contacting you to keep you informed of church news, activities and events.
- With your specific consent, for the production of a church family contact list made available to other people part of the Emmanuel Bristol church family.
- Safeguarding and DBS purposes.
- Statistical analysis to gain a better understanding of church demographics to inform our planning and decision making.
- Observed data to promote intentional discipleship and for pastoral care and oversight, and to optimise website services and other communication.
- The Emmanuel Bristol website collects information including: your IP address, browser type, domain names, access times and referring website addresses. This information is used for the operation of the service, to maintain quality of the service, and to provide general statistics regarding use of the Emmanuel Bristol web site.

## 5. Confidentiality

Emmanuel Bristol will treat all your personal information as private and confidential and not disclose data about you to anyone other than pastors, employed staff, your small group leaders, authorised leadership (such as elders) and ministry overseers/co-ordinators of the church in order to facilitate the administration and day-to-day ministry of the church.

Our Principal tool for storing and managing your personal data is *ChurchSuite*. ChurchSuite is a third party, to find out more about their security please visit <https://churchsuite.com/tour/security>.

Emmanuel Bristol uses a small number of other third party organisations to process your data, these include: MailChimp (for sending church wide emails), Google, Dropbox, Microsoft OneDrive/SharePoint, QuickBooks Online (for finances), Payroo (employee payments). Outside of these companies listed your personal data will not be given or sold to any other person, company or church without your prior knowledge and consent.

### **There are four exceptional circumstances to the above permitted by law:**

1. Where we are legally compelled to do so;
2. Where there is a duty to the public to disclose;
3. Where disclosure is required to protect our interest;
4. Where disclosure is made at your request or with your consent.

## 6. How long will we keep your data?

Personal data will be held whilst you are part of the church family. We endeavour to minimise the amount of personal data we retain. We will make reasonable effort to destroy what personal data we hold 2 years after we become aware you have left the church or if we receive a written request from you. The exception to this will be where there are legitimate interests for holding the data or if we need to keep statutory records for a longer period, such as for accounting or gift aid records.

Specifically, we retain the address list whilst it is still current; financial records for up to 6 years after the calendar year to which they relate; safeguarding information for 70 years; children's group registers 50 years; health and safety forms for 3 years after the calendar year of the incident, except where legal exceptions apply; and legal registers (baptisms, marriages, funerals) permanently.

## 7. Event sign-ups

We will only store and process your personal data for purposes related to that event, unless you have already provided consent to have your personal data held within the Emmanuel ChurchSuite database. Your personal data will be removed from the Emmanuel database 2 years after the event or if we receive a written request from you. You will not receive further communication from Emmanuel without your consent.

## 8. Your rights and your personal data

Unless subject to exemption under GDPR, you have the following rights with respect to your personal data: -

- **Right to be informed:** the right to know how we process your personal data. Emmanuel Bristol has an obligation to be transparent and provide 'fair processing information', an example of which is this Privacy Notice.
- **Right of access:** the right to request a copy of your personal data, which Emmanuel Bristol holds about you.
- **Right to rectification:** to request that Emmanuel Bristol corrects any personal data if it is found to be inaccurate or out of date.
- **Right to erasure:** to request your personal data is erased where it is no longer necessary for Emmanuel to retain such data.
- **Right to data portability:** this right allows you to obtain and reuse your personal data for your own purposes across different services. You can move, copy or transfer your data easily from one IT source to another in a safe and secure way.
- **Right to restrict processing:** where there is a dispute in relation to the accuracy or processing of your personal data, you may request a restriction is placed on further processing.
- **Right to object:** to object to the processing of personal data where processing is based on legitimate interests or the performance of a task in the public interest/ exercise of official authority (including profiling); direct marketing (including profiling); and processing for purposes of scientific/ historical research and statistics.
- **Right to lodge a complaint with the Information Commissioners Office.**

## 9. Further processing

If we wish to process your personal data for a new purpose, not covered by this Data Protection 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. When and wherever necessary, we will seek your prior consent to the new processing.

## **10. Contact details**

To exercise all relevant rights, queries or complaints please in first instance contact Emmanuel Bristol's administrator at [admin@emmanuelbristol.org.uk](mailto:admin@emmanuelbristol.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 Commissioners Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.