

FIRST CHURCH OF CHRIST, SCIENTIST, BOURNEMOUTH

DATA PRIVACY POLICY

The processing of personal data (including use) is governed by the General Data Protection Regulation (the “GDPR”). This is an EU Regulation soon to be replaced in the UK by a new Data Protection Act (DPA). Personal data relates to a living individual who can be identified from it (the ‘data subject’.)

Consent and legitimate interests

This church considers it has legitimate interests in holding the personal data of present and former members, Sunday school pupils and their parent/guardians, members, former members, suppliers, volunteers, customers and employees, so consent is not required from these individuals. We share members’ contact details with all other members for administrative use.

It is our policy that consent should be sought from non-members whose personal data is held by the church in order to keep them informed about activities such as Lectures, services, meetings and Reading Room activities.

Use of personal data

Personal data is used:

- to administer membership records;
- to manage the church’s activities, suppliers, customers, and volunteers;
- to maintain financial records (including the processing of gift aid applications);
- to inform people in the community of events and activities of the church and of related activities in the Christian Science movement and to respond to inquirers;
- generally, to promote the interests of the church.

If the church wishes to use personal data for a purpose not covered by this Data Privacy Policy, a new notice will be issued explaining the use and setting out the purposes and processing conditions and seeking the data subject’s consent.

Data protection

The church complies with its obligations under the 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.

Data is password protected on the Clerk’s and Treasurers computers.

Paper records, members’ names and addresses, and files concerning church committees etc are kept in the clerk’s office which is locked when not in use.

All personal data will be treated as strictly confidential and will only be shared with other members of the church in order to carry out a service to other members or for purposes connected with its activities. It will not be shared with third parties except with the data subject’s consent; it will not be sold.

Data retention

Membership information, Sunday School records, and information related to Safeguarding will be retained for at least 50 years. Non-members' data held with consent will be retained while it is still current or until consent is withdrawn. Consent will be confirmed every 5 years. Gift aid declarations and associated paperwork will be retained for 7 years after the tax year to which they relate. Other financial records will be retained for 6 years after the transaction they relate to.

Data subjects' rights

Data subjects have the right:

- to request a copy of any personal data which the church holds about them;
- to request the church to correct any personal data that is inaccurate or out of date;
- to request that personal data be erased if it is no longer necessary for the church to retain it;
- to withdraw consent to the processing at any time;
- to request the data controller to provide them with their personal data and, if they wish, send it to another data controller;
- if there is a dispute about the accuracy or processing of personal data, to request a restriction be placed on further processing;
- to object to the processing of personal data;
- to lodge a complaint with the Information Commissioner's Office; see the website at www.ico.org.uk .

Data Controller

The Data Controller is the Board.

Policy reviews

This policy will be reviewed every 2 years and any change adopted as required.

This was agreed by the Board on May 22nd 2018

Adopted by the membership
July 16th 2018

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..... Clerk

FIRST CHURCH OF CHRIST, SCIENTIST, BOURNEMOUTH

GDPR COMPLIANCE BOARD REPORT

The Board has reviewed the Church's activities to ensure that they comply with the requirements of the General Data Protection Regulation.

Data Controller

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Information audit

We have audited the data that we hold and ensured that we only hold data that is current. Any out of date data has been deleted or securely disposed of.

Basis for holding and processing data

We have reviewed the lawful basis under GDPR Article 6 on which we hold data.

Most of our data is held either on a contractual basis (members) or for legal reasons (safeguarding and Gift Aid) or to meet the legitimate interests of the church. Consent is therefore not needed from members, former members or individuals with whom there is regular contact.

Members: We share members' contact details with other members for administrative purposes, but do not share them with any other organisation without their specific consent. We communicate with members by email in relation to their membership, the running of the church, church related activities and events, and their roles in the church, or by post if they do not have email.

Volunteers: Volunteers, regular visitors, and suppliers such as musicians, cleaner, and gardener also give us their personal data and this is used on the same basis as that of members. It is shared with members only as necessary for the activities the individual is or may be involved in.

Data held with consent

Other data we hold is given to us by people requesting information about Christian Science and our meetings and events, and we use it to respond to that request and to enable them to attend the meetings and events, where their request is accepted. This is done on the basis of their consent, which is gained in writing when they ask to be kept informed or subsequently.

Special category data

This is personal data which the GDPR says is more sensitive, and so needs more protection. Data about a person's religion is considered special category data.

In order to lawfully process special category data, we must identify both a lawful basis under Article 6 (as above) and a separate condition for processing special category data under Article 9. The condition for the special category is that "processing is carried out in the course of its legitimate activities with appropriate safeguards ...and on condition that the processing relates solely to the members or to former members of the body or to persons who have regular contact with it ...and that the personal data are not disclosed outside that body without the consent of the data subjects."

Privacy notice

We provide all whose data we hold with a privacy notice stating the nature of the personal data we hold, how it is kept secure and the purposes for which it is or may be used. The church does not share any personal data with other organisations for marketing purposes.

Collecting data

In the future, when we collect an individual's personal data we will provide a privacy notice about how we will use the data, and about our privacy policy and how they can access it. We will also request written consent to hold their data and use it if appropriate.

Security of data

We take reasonable steps to make sure that the data we hold is secure by ensuring that it is held in as few places as practical, that if it is stored in 'the cloud' a reputable storage system is used and that unauthorised people do not have access to the data. See also our Data Protection policy contained within our Privacy Policy.

22.05.2018