

## PRIVACY STATEMENT AND DATA PROTECTION POLICY <sup>1</sup>

**Data Controller:** Immanuel Church Brentwood, known as IMMANUEL

**Data Protection Officer:** Caroline Evans (Church Office Manager)

**Date of Policy:** 12 May 2018

**Date of review:** September 2024

This is the privacy statement and data protection policy for Immanuel Church Brentwood. It 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.

The policy covers our use of **Personal data**, which is any information about a living individual which allows them to be identified from that data (for example a name, photographs, email address, or address). Identification can be by the information alone or in conjunction with any other information.

Our **processing of personal data** is governed by the Data Protection Bill/Act 2017-2019 and 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.

**Who are we?** This Privacy Notice is provided to you by IMMANUEL which is the **Data Controller** for your data. IMMANUEL has appointed a number of responsible people for the control and processing of personal data that we hold. For clarity, the term Data Controller covers all employed staff members, office holders and trustees for IMMANUEL.

*Note: The Senior Minister of IMMANUEL is also a separate data controller for data he holds as a minister.*

### So, how is your data used and processed?

IMMANUEL processes data that may include:

- names, titles, and aliases;
- photographs;
- 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, education/work histories, academic/professional qualifications, family composition, and details of their dependants (date of birth, age, gender, allergies);
- Where you give financially in support of IMMANUEL or pay for church activities (event bookings etc.), financial identifiers such as bank account numbers, payment card numbers, payment/transaction identifiers, policy numbers, and claim numbers;
- As a church (religious organisation), 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. We would not normally process other personal data that is sensitive (such as racial or ethnic origin, sex life, mental and physical health, details of injuries, medication/treatment received, political beliefs, data concerning sexual

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<sup>1</sup> Based on a template provided by UCAN (UK Church Administrators Network)

orientation and criminal records, fines and other similar judicial records). If you provide any of this data (for example in private pastoral conversations with) it will be not be shared without your permission unless we have an obligation to do so.

As a Data Controller, all our appointed persons 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. Further details of how we process and store data securely are available in our Cyber-Security policy. If you have any concerns about how your data is being used, please contact our Data Protection Officer: Caroline Evans.

### **How do we store your data?**

#### *On the main church database*

The church database is hosted by website called ChurchSuite. Access to any personal information is restricted by individual passwords to church members. Neither Immanuel Church nor ChurchSuite will share data subjects' information with any other parties without data subjects' consent. ChurchSuite will not use data subjects' information as a mailing list for any purpose and will not resell or otherwise distribute data information. For more details please see <https://churchsuite.com/gdpr/>

#### *In hard copy or on computer*

Physical (hard copy) personal data is stored in locked storage units or containers e.g. a filing cabinet. All computers are password protected and documents containing personal data will also be password protected where necessary/appropriate. When we no longer need to keep personal data, paper documents will destroyed securely.

### **What are we doing with your data?**

We only hold data that either we are legally obliged to or that helps us fulfil our mission and charitable aims as a church. Good communication with our members, those who attend our church or are connected with us is an essential part of being a church.

Therefore, we may hold and process data to:

- Enable us to meet all legal and statutory obligations;
- Comply with and facilitate our comprehensive safeguarding procedures (please see our Safeguarding Policy for further details);
- To inform you of news, events, activities and services at IMMANUEL or one of our partner churches;
- Pastoral Care and Prayer;
- Administration (e.g. preparation of rotas, name labels for services, attendance registers for youth and children's groups, training completion);
- To administer membership records;
- To maintain our own accounts and records (including the processing of gift aid applications);
- To maintain an online directory for those who want to share contact details with others in the directory (using the ChurchSuite website);
- To facilitate employment and payroll procedures.

Our processing currently does NOT include the use of CCTV systems for the prevention and prosecution of crime.

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

- Most of our data is processed because it is necessary for our legitimate interests to enable our charitable aims. For example, maintaining membership records, safeguarding our children, recording our financial donations and operating team rotas for the effective function of Sunday services.
- 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. For example, if you buy tickets for a church event or book a place in a conference.
- As a religious organisation, we are permitted to process information about your religious beliefs to administer membership or contact details.
- 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. It will only be shared with third parties where it is necessary for the performance of our tasks or where you first give us your prior consent. It is likely that we will need to share your data with some or all of the following (but only where necessary):
  - Appropriate bodies within our denominational structure. All of these bodies will be part of our church setup and have their own privacy policies.
  - A small number of Data Processors who securely store or use data on our behalf. For example, we use accounting software to submit details of donations and Gift Aid claims to HMRC, and we use a service provider to maintain our database and our website.
- As part of ChurchSuite, there is a member-facing area called My ChurchSuite, which contains a church Address Book. Each member can update their own details within this Address Book and you can search for other members' contact details. It is important to note that the Address Book is only be available to those who have been given permission—that is, those who are listed in our church database. However, if you are not happy for your contact details to be available to the church, then you can choose to hide them through the 'Privacy Settings' on the web site. These can be adjusted at any time.

### **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 a quarterly process of review, by which we assess who is actively engaging in church membership, and where this is not the case we will contact you to ask if you would like us to remove your data. Additionally:
- We will keep some records permanently if we are legally required to do so. For example this covers service, wedding, baptism registers and some safeguarding records.
- We may keep some 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 to support HMRC audits.

## What are your rights in regards to 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 information we hold on you.** At any point you can contact us to request the information we hold on you. This is called a Subject Access Request (SAR). General Data Protection Regulation (GDPR) allows individuals the right to ask an organisation if they are using their personal information, to request copies of the information held about them and other supplementary information. Once we have received your request we will respond within one month. There are no fees or charges for the first request but additional requests for the same data may be subject to an administrative fee.
- **The right to correct and update the information we hold on you.** If the data we hold on you is out of date, incomplete or incorrect, you can inform us and your data will be updated. If your details are in the online directory you can update aspects of your personal data directly via the ChurchSuite website, using your log-in details.
- **The right to have your information erased.** 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 (for example because we need it for our legitimate interests or regulatory purpose(s)).
- **The right to object to processing of your data.** You have 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. Even after you exercise your right to object, we may continue to hold your data to comply with your other rights or to bring or defend legal claims.
- **The right to data portability.** You have the right to request that we transfer some of your data to another controller. 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 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 lodge a complaint** with the Information Commissioner's Office. 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.

## Transfer of Data Abroad

It is not our general practice to transfer personal data overseas. If however, for any reason electronic personal data is to be transferred to countries or territories outside the UK, it will only be placed on systems complying with measures giving equivalent protection of personal rights either through international agreements or contracts approved by the United Kingdom.

Our website is accessible from overseas so on occasion some personal data (for example in a newsletter) may be accessed from overseas, however it is our general practice not to publish personal data on our website or in our publications without a person's consent.

**Further processing**

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

**You are very welcome to get in contact with us...**

If you have any queries or concerns about how we use your data, please do get in contact with us.

**Contact Details**

Our Data Protection Officer is our Church Office Manager, Caroline Evans.  
She can be contacted by e-mail: [admin@immanuelbrentwood.org](mailto:admin@immanuelbrentwood.org)

This Policy will be reviewed annually. Next review: before the 2026 AGM

Immanuel Church Brentwood is a company limited by guarantee Registered in England No 8819716  
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Charity Reg. No 1156523