

## Eastleigh Baptist Church Congregation Privacy Notice

Eastleigh Baptist Church ("We / EBC") are committed to protecting and respecting your privacy.

This policy and any other documents referred to on it sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

The rules on processing of personal data are set out in the General Data Protection Regulation (the "GDPR").

### 1. Definitions

**Data controller** - A controller determines the purposes and means of processing personal data.

**Data processor** - A processor is responsible for processing personal data on behalf of a controller.

**Data subject** – Natural person

#### **Categories of data: Personal data and special categories of personal data**

**Personal data** - The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (as explained in Article 6 of GDPR). For example name, passport number, home address or private email address. Online identifiers include IP addresses and cookies.

**Special categories personal data** - The GDPR refers to sensitive personal data as 'special categories of personal data' (as explained in Article 9 of GDPR). The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.

**Processing** - means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**Third party** - means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

**Leader** – leader of any group which operates under the banner of Eastleigh Baptist Church.

### 2. Who are we?

The charity Trustees of Eastleigh Baptist Church is the data controller. This means we decide how your personal data is processed and for what purposes. We can be contacted via the Church Secretary on [secretary@e-b-c.net](mailto:secretary@e-b-c.net) or on 023 8061 3210. For all data matters please



contact the Data Protection Trustee or Data Protection Leads on [dataprotection@e-b-c.net](mailto:dataprotection@e-b-c.net) or on 023 8061 3210.

### **3. The purpose(s) of processing your personal data**

We use your personal data for the following purposes:

- To maintain a database of those in membership or those linked to EBC including a paper directory of contact details.
- To enable us to provide adequate pastoral support to you and your family.
- To communicate regularly with you regarding all aspects of the life of EBC including prayer requests and sign ups for events.
- To maintain training records and rotas.
- To maintain financial records of your giving and associated gift aid re-claims.
- To maintain a visual history of church life through photographs and videos.

### **4. The categories of personal data concerned**

With reference to the categories of personal data described in the definitions section, we may process the following categories of your data:

#### 4.1 Personal data:

- Name
- Postal address
- Telephone / mobile number(s)
- Email address
- Date of Birth
- Gender
- Marital status
- Significant dates – baptism, membership, anniversaries etc.
- IP address
- Bank account details
- Financial giving records
- Training records
- Photograph and video images
- Social media usernames and comments

#### 4.2 Special categories of data:

- Prayer requests that may contain sensitive personal information
- Health information insofar as you have provided it in order for us to provide appropriate pastoral care
- Sexual orientation information insofar as you have provided it in order for us to provide appropriate pastoral care

We have obtained this data from you when you became members of EBC, started to give financially to EBC, started receiving pastoral care from EBC, asked for prayer, when you requested regular communications from EBC, attended a training event, started accessing our social media sites, requested that your information be held on our database or logged onto



our guest Wi-Fi. Pictures or videos may have been taken at various events or services you have attended.

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

### **a) Personal data (article 6 of GDPR)**

#### **Our lawful basis for processing your general personal data:**

We collect this information to enable us to keep in touch with you, maintain training records, maintain a visual history of the Church and provide pastoral support as appropriate. Data Protection legislation allows us to process this information as we regard it in being in EBC's legitimate interests. However we recognise that not everyone is happy to be photographed or videoed. In particular, images of children or vulnerable adults will not be taken without consent. Please see full details of our Photograph and Video policy [here](#).

We are required to hold detailed accounting and gift aid records so your financial information is processed in order for us to comply with this legal obligation.

### **b) Special categories of personal data (article 9 of GDPR)**

#### **Our lawful basis for processing your special categories of data:**

We collect this information to provide the appropriate pastoral support and to pray for you. Data Protection legislation allows us to process this information as we regard it in being in EBC's legitimate interests. We will not provide this information to a third party without your consent unless there is an overriding obligation for us to do so. We will always ask for your verbal consent to be included on our Eprayer and as far as possible for any other kind of paper prayer bulletin. This verbal consent will be recorded by the Eprayer Administrator or any of our Prayer Leaders producing bulletins.

## **6. Sharing and storing your personal data**

Your personal data will be treated as strictly confidential and is held centrally on EBC's password protected computer systems or EBC owned encrypted laptops. Your personal data can be accessed by the following teams or people:

- General contact details – Admin Team and EBC Database Administrator
- Significant Dates - Admin Team, EBC Database Administrator and Pastoral Co-ordinating Team (PCT)
- IP address – Technical Team
- Bank account details – Treasurer, Finance Team and Church Operations Manager
- Financial giving records - Treasurer, Finance Team and Church Operations Manager
- Training records – Ministers, Administration Team, Catering Team
- Photograph and video images – Admin Team, Communications Team and Technical team
- Social media usernames and comments – Admin Team and Communications Team

You may also have provided some of this personal information to a Leader of a group you attend eg small group leader, sports group leader etc. These Leaders are required to keep your information confidential and to store it on password protected devices or in securely stored notebooks / files in their own homes. Leaders may share this information with the Data



Controller, Data Protection Trustee, Data Protection Leads, the Leader of the Pastoral Coordinating Team, the Ministry Team or the Admin Team and vice-versa as appropriate.

Your sensitive data will also be treated as strictly confidential. This information is stored only by the Leader of the PCT either on the password protected EBC computer system or EBC owned encrypted laptop or in a file securely stored in the Leader's home. Only the PCT, the Ministry Team, the EBC Administrator and the EBC Database Administrator have access to some or all of this information. The Leadership Team will receive a monthly summary from the PCT which is securely stored on the Leadership Team's password protected Sharepoint site.

## **6. The Church Directory**

We would like to include the contact details we hold for you (name, postal address, telephone / mobile numbers, email address) in our paper church directory. Once printed these directories will only be given to those people who have an entry in it or any other person as determined by the Data Protection Trustee or Leads at their discretion as having need of it for the legitimate interests of EBC. We recognise however that once printed and distributed the level of control of this information can no longer be guaranteed by EBC. At every publication of the directory, we will therefore ask for your consent for your information to be contained within it. This could be done by asking you to sign your entry in the master copy produced for this purpose (and for the purpose of you checking the accuracy of the information we hold for you) or by any other consent form. If you do not give consent then your information will not be published in this directory. You have the right to withdraw your consent at any time but your information will not be removed from the current published directory until the next directory is printed.

On receiving a copy of the printed directory you are required to shred any previous old directories that you might have. You can do this either at home or by giving it to one of the Admin Team to do for you.

The Church Directory will be held by those whose details are in it and in the church offices.

## **7. How long do we keep your personal data?**

We keep your personal data as per detailed in our Data Retention Policy which can be accessed [here](#).

## **8. Providing us with your personal data**

You are under no statutory or contractual requirement or obligation to provide us with your personal data. If you don't however, we will not be able to contact you, accept financial donations from you or provide reasonable levels of pastoral care to you or your family.

## **9. Your rights and your personal data**

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

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;



- The right to request your personal data is erased where it is no longer necessary to retain such data;
- The right to withdraw your consent to the processing at any time, where consent was your lawful basis for processing the data - only relevant for the use of images in certain situations (please refer to our Photograph and Video Policy) or for prayer requests or for publication of your contact details in our Church Directory (see section 6).
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable i.e. where processing is based on legitimate interests or is direct marketing).

## **10. Transfer of Data Abroad**

We use a number of Data Processors (eg Mailchimp) who may process your data in countries outside of the EEA. EBC has a legal agreement in place with these data processors in which they are required to maintain appropriate levels of security of your data.

## **11. Automated Decision Making**

We do not use any form of automated decision making within EBC.

## **12. Further processing**

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

## **13. Changes to our privacy policy**

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

## **14. How to make a complaint**

To exercise all relevant rights, queries or complaints please in the first instance contact one of our Data Protection Leads on [dataprotection@e-b-c.net](mailto:dataprotection@e-b-c.net) or 023 8061 3210.

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the [Information Commissioners Office](https://ico.org.uk/global/contact-us/email/) on 03031231113 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, England.

24<sup>th</sup> May 2018

