



# Privacy Notice

As a church we like to communicate with our church family and supporters so that they can hear all about what is going on in the life of the church, as well as provide updates on future events, news, the work that they're making possible and to give opportunities to request and provide additional support should they desire it. It's important to our relationship that our church family and supporters only receive information that is relevant to them. As such, we will only ever use personal information that is entrusted to us for these reasons and we will never share details with anyone else for their own use or sell data to another organisation. People's data is precious to us and we take that responsibility very seriously.

With effect from 25<sup>th</sup> May 2018, the law changed about how organisations, including churches, use and protect personal information. The General Data Protection Regulation (GDPR) took effect and it is all about giving people more control over the personal information organisations hold about them – whether it's something as simple as a name, or as complex and sensitive as medical

information. This means people can have greater confidence that the information that is given is held accurately, securely and is properly managed. All organisations have to review how they manage personal data – from email addresses to employee bank details. A lot of organisations now ask for consent so that they can contact people about offers, products or services they think will be found useful or interesting. People now get to choose who contacts them and how, for example by email, post, social media or phone.

Upon leaving the EU on January 1, 2021, **the UK is officially not a part of the EU's GDPR any longer**, i.e. the EU's GDPR does not have any domestic jurisdiction in the UK as it had from May 2018. The UK has passed its own version called the **UK-GDPR**, which **alongside the Data Protection Act of 2018**, is now in effect.

In practice, there is little change to the core data protection principles, rights and obligations

**For Chawn Hill Church, some of the ways we use the personal information we receive are;**

- to provide pastoral support
- to inform you of news, events, activities and services running at Chawn Hill Church
- to administer church attendance
- to fundraise and promote the interests of the charity
- to manage our employees and volunteers
- to maintain our own accounts and records including the processing of gift aid applications

For more information about how we collect, use and store your information and what it means for you please read on.

# Version Control

Version Number	Author	Purpose / Change	Date Approved	Date Issued
1	Sara Sarjeant Operations Manager	Creation of notice, GDPR compliance	24.10.2018	24.10.2018
2	Sara Sarjeant Operations Manager	Review and update	17.11.2020	18.11.2020
3	Sara Sarjeant Operations Manager	Following the end of the Brexit transition period we have replaced references to the EU GDPR with references to the UK GDPR. We have also updated the list of organisations and individuals we work with.	14.09.2021	15.09.2021

Chawn Hill Church is designed to provide Jesus-centred care and discipleship to our church members and community. In order to facilitate this we primarily use a cloud hosted, web-based church management system called ChurchSuite to manage all of our administrative functions. This software also provides our church members with an online member-facing system called "My ChurchSuite" which enables people to engage on a deeper level with the life and activity of our church. My ChurchSuite can also be used to provide us with information (including personal information), update preferences and access options to allow the booking of events and recording of attendance. Using ChurchSuite and My ChurchSuite means that we can stay in touch with our church family much more easily and that you can provide us with information in a quick and efficient way.

In addition to ChurchSuite, we also collect information from you in person or on paper forms and from online forms within other systems, for example, our website. We have also included information about other forms of processing that we carry out within this notice.

### **What is the purpose of this Privacy Notice?**

Chawn Hill Church is a "Data Controller" which means we have to tell you certain information when processing your personal information. We may input personal information into ChurchSuite or may ask you to do so yourself. We may collect information from you in person or we may ask you to fill in paper forms or input information into other systems that the church uses.

This Privacy Notice relates to your engagement with Chawn Hill Church and tells you:

- what personal information we collect about you when you contact us
- how we collect your personal information
- how we use your personal information
- who we may share your personal information with
- any transfer of personal information outside of the EEA
- how long we keep your personal information for
- what we do to protect your personal information
- what choices you have in relation to your personal information

### **Personal Information we process about you**

We may collect the following information about you:

- your name and address

- your mobile phone number
- your email address
- whether or not you are ordained or in holy orders
- any ecclesiastical permissions you hold
- your marital status
- your age and gender
- information about your family
- your education and employment
- your role(s) within the church (if appropriate)
- any status as a representative for the church
- attendance at meetings, events and training
- to carry out a DBS check
- the result of a DBS check
- information about your use of our website and ChurchSuite e.g. when you have logged in to My ChurchSuite
- information we collect and record as part of pastoral care (this will include anything you tell us unless you tell us not to record it)
- information you tell us relating to a Safeguarding
- payment details when booking events
- donations to the church
- any information you provide to us
- any teams or groups you are involved with
- when you are unavailable for serving on rota
- dates and times that you are on a rota

### **Personal Information you give us**

We may collect personal information from you when you attend church and speak to us in person. You may fill in one of our paper forms, or a form available in a different electronic system such as on My ChurchSuite or on our website.

We also collect personal information from you when you or we set up a user account for you in ChurchSuite. If we set up an account on your behalf, then we will input personal information from you that we collected from you via our 'response card'. We will also collect information from you when you update your user account yourself via My ChurchSuite.

### **Sensitive Personal Information**

We may also collect, store and use the following "special categories" of sensitive personal information (if you give us this information), for example, information

about your health, including any mental or physical conditions that you notify us about;

- your religious beliefs
- your racial origin
- your sexual orientation
- any criminal record

### **Personal Information we collect automatically**

When you use Chawn Hill Church's website or My ChurchSuite or read our emailed Ebulletin, we may collect certain information automatically such as:

- IP addresses (which tell us, for example, the places where people are logging on)
- which pages people visit and which files people download. This helps us find out if people's use of our website, ebulletin and My ChurchSuite are working well and helps us improve them. Some of this information is collected using 'cookies' – see the cookies section below

### **Cookies**

A cookie is a text file that tells us about your visit to our website. The information is anonymous, so we're told about your computer, not you. And when the data comes to us it's bulked together with information from all other visitors to our site. Cookies tell us for example about user location data, device information, the date and time people visit and the pages they visit. Most major websites use cookies.

Cookies help us;

- customise what you see when you visit our site, and help us understand what would interest you
- process any requests, applications or transactions
- do our internal administration and analysis

### **How to delete and control cookies**

Most computers automatically accept cookies but you can change your settings so that you will not receive cookies and you can also delete existing cookies from your computer.

If you do change your settings, you may find that some parts of our website will not function properly. If you do not adjust your settings, you will accept cookies provided by this website.

To find out how to delete cookies or adjust their settings please visit <http://www.allaboutcookies.org/>.

## How we use your personal information

Our **legal basis** for using your information.

The law only allows us to use your personal information in certain limited circumstances. We have listed these below and what information they allow us to process:

### 1. Where it is necessary for our **legitimate interests**

The UK GDPR specifically states that a church may use **legitimate interests** to process personal information relating to its congregation and connected community. We consider that this is the most appropriate condition for us to run our church as you would reasonably expect that we would have to process personal information in order to best connect with our congregation and connected community so that individuals, groups and organisations can take full advantage of all our services. We have put safeguards into place to ensure that personal information is protected and that your fundamental rights and freedoms are not overridden.

Examples of how we may use your information for administration purposes:

- to set up your My ChurchSuite account
- so that we can keep a record of your attendance at church, courses and at other events and meetings
- to provide you with pastoral care and other support that you have requested and we believe would be helpful to you
- to organise volunteers and put together rotas
- we may also use legitimate interests to share information about our church and to promote Chawn Hill Church's interests (this is referred to within UK GDPR as "marketing" materials) but only where such information relates directly to our church and you have not told us not to send you such information

### 2. Where you have **consented** to us using your personal information

Examples of how we may use your information with **consent**:

- we may ask for your consent to send church related marketing communications to you which would also include information about our events
- we may also ask for consent where you have given us information as part of our pastoral care and asked us to use it for a certain purpose

### 3. Where we need to perform the **contract** we have entered into with you

Examples of how we may use your information in order to comply with a contract that we have entered into with you:

- to buy tickets for events
- to administer the database (such as troubleshooting, data analysis, research)
- to tell you about changes to our website, software or the database that will affect your use of My ChurchSuite
- to help the software developers of ChurchSuite to improve their services

### 4. Where we need to comply with a **legal obligation**

Examples of how we may use your information to fulfil a **legal obligation**:

- keeping records for gift aid purposes
- to prevent and detect fraud
- to protect children and vulnerable adults

## **How we use Personal Sensitive Information**

“Special categories” of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

1. in limited circumstances, with your explicit consent recorded in writing (e.g. where you tell us information in order to obtain support and pastoral care from us – for example this could relate to physical or mental health)
2. where we need to carry out our legal obligations (e.g. ensure DBS checking is done where appropriate)
3. where it is needed in the public interest and in line with our **Data Protection Policy**



4. where it is needed in connection with our **Safeguarding Children, Young People and ACS Policy and Procedures**

Less commonly, we may process this type of information when it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

### **What this means in practice**

We may use your sensitive personal information in the following ways:

- your mental or physical health, racial origin, sexual orientation or criminal record in order to provide you with support and pastoral care
- we may also use this information to help you access support and benefits if appropriate and requested by you
- your religious beliefs in order to administer your engagement with our church
- your DBS check (which may contain information relating to criminal offences or presence on a register) to decide your suitability for roles in the church

In all cases where we require consent, we will seek your written consent or record your consent in writing to allow us to process certain sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your engagement with us that you agree to any request for consent from us.

### **Information about Children**

Whilst information relating to children is not considered to be special category information, it is information that is given specific protection. Where the child is under the age of 13 we will always ask for the consent of parents before allowing the child to set up an account in My ChurchSuite and ensure that the parent/s are able to access and administer the account.

Where a child is 13 or over then we will permit the child to have their own My ChurchSuite account, but we may (if we believe it to be appropriate in the circumstances) inform the parents. We will tell the child at the time of signing up that we may inform their parents and we will only do this where it is appropriate and lawful to do so.

## Sharing your Personal Information

Other third parties

We may share your information with certain third parties including:

- with other attendees of our church (with your consent) so that they can provide you with support and pray for you
- other churches – if you request us to pass on your information either to them or from them (if you move)
- support services and benefits providers (e.g. local authorities, your doctor)
- our suppliers (e.g. ChurchSuite) for the performance of any agreement we enter into with them or you

## We work with the following organisations and individuals:

- **ChurchSuite** – church management software (*Privacy Policy: <https://churchsuite.com/privacy-policy>*)
- **Microsoft Office** - email provider and document storage (*Privacy Policy: <https://privacy.microsoft.com/en-us/privacystatement>*)
- **HMRC** - for claiming of Gift Aid, payment of employee taxes and NI contributions (*Privacy Policy: <https://www.gov.uk/government/organisations/hm-revenue-customs/about/personal-information-charter>*)
- **WhatsApp** - many of our volunteer teams and home group leaders and members use WhatsApp to communicate with one another (*Privacy Policy: <https://www.whatsapp.com/legal?eea=1#privacy-policy>*)
- **Slack** – our staff, Trustees and many of our volunteer teams and home group leaders and members use Slack to communicate with one another (*Privacy Policy: <https://slack.com/intl/en-gb/trust/privacy/privacy-policy>*)
- **QTAC** - for processing employee pay (*Privacy Policy: <https://www.qtac.co.uk/privacy-policy/>*)
- **NEST** - for processing employee pensions (*Privacy Policy: <https://www.nestpensions.org.uk/schemeweb/nest/nestcorporation/privacy-policy.html>*)
- **Data Developments** – for book keeping and making Gift Aid claims (*Privacy Policy: <https://www.datadevelopments.co.uk/privacy-policy>*)
- **Kingswinford Computer Repairs Ltd** – for all our IT needs and email hosting (*<https://www.kingswinfordcomputerrepairs.co.uk/> Data Processing Agreement in place*)
- **Visual Advance** – for all of our website services (*<https://www.visualadvance.co.uk/> Data Processing Agreement in place*)

- **RaiDrive** – software that enables access to our shared drive remotely (*Privacy Policy: <https://www.raidrive.com/about/privacy>*)
- **Synology** – to back up and store our documents on a cloud based storage system (*Privacy Policy: <https://www.synology.com/en-uk/privacy>*)
- **Malcolm Moss – Treasurer** - to monitor and process all financial activity related to Chawn Hill Church (Data Processing Agreement in place)

## **Legal Requirements and Law Enforcement**

We may also disclose your personal information to third parties:

- if we are required by law, or in order to enforce or apply our terms of use. This includes exchanging information with other organisations such as law enforcement agencies.

## **Third Party Privacy Policies**

Chawn Hill Church’s website may contain links to websites owned by other organisations. If you follow a link to another website, these websites they will have their own privacy policies. We suggest that you check the policies of any other websites before giving them your personal information as we cannot accept responsibility for any other website.

## **Keeping your Personal Information**

How we store your personal information.

The security of your personal information is important to us:

- we use appropriate technical and organisational measures to safeguard personal information and encryption technology where appropriate to enhance privacy and help prevent information security breaches
- any personal information that we provide to you will be held within the UK
- all third parties who provide services to us or our software provider are required to sign a contract requiring them to have appropriate technical, administrative and physical procedures in place to ensure that your information is protected against loss or misuse.
- all information you provide to us is stored on our secure servers or on secure servers operated by a third party (information on our third-party providers can be found above).

## **Retention of information**

We only hold your personal information for as long as necessary for the purposes for which we collected your information.

We have a **Data Retention Policy** which lays down timescales for the retention of information.

We have set these timescales in accordance with applicable legislation and where none exists then we will keep your information for the duration of any contract that you have entered into with us and then for a period of 7 years after which time it will be deleted.

## **Emails**

If you choose to send us information via email, we cannot guarantee the security of this information until it is delivered to us.

## **Your rights**

### **1. Access to information**

You have the right to access information that we hold about you. If you wish to receive a copy of the information that we hold, please contact the Operations Manager at Chawn Hill Church or write to us at the address below.

### **2. Changing or deleting your information**

You can ask us at any time to change, amend or delete the information that we hold about you or ask us not to contact you with any further marketing information. You can also ask us to restrict the information that we process about you.

You can request that we change, amend, delete your information or restrict our processing by emailing us at [admin@chawnhillchurch.org.uk](mailto:admin@chawnhillchurch.org.uk)

### **3. Right to prevent Automated decision making**

You have a right to ask us to stop any automated decision making (“automated decision making” is a decision solely made by automated means without any human involvement e.g. automatic refusal of an online credit application or e-recruiting practices without any human intervention).

We do not carry out such activities, but if you do have any questions or concerns we would be happy to discuss them with you and you can contact us at [admin@chawnhillchurch.org.uk](mailto:admin@chawnhillchurch.org.uk)

#### 4. Transferring Personal Information

You have the right to request that your personal information is transferred by us to another organisation (this is called “data portability”). Please contact us at [admin@chawnhillchurch.org.uk](mailto:admin@chawnhillchurch.org.uk) with the details of what you would like us to do and we will try our best to comply with your request. It may not be technically feasible, but we will work with you to find a solution.

#### Complaints

If you make a request to us under this Privacy Notice and you are unhappy with the response, you can ask for the request to be reviewed by our Operations Manager who will do their best to try and resolve the issue.

If you have been through the above procedure and are still not happy with the result, then you have the right to complain to the Information Commissioner’s Office. They can be contacted as follows:

Website: [www.ico.org.uk](http://www.ico.org.uk)

Telephone: 03031231113

Address: **Information Commissioner's Office**

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

#### Changes to our Privacy Notice

We will review our Privacy Policy on a frequent basis to check that it accurately reflects how we deal with your information and may amend it if necessary. You should check this page regularly to see the most up to date information.

#### How to Contact us

We welcome questions, comments and requests regarding this Privacy Notice which can be sent to [admin@chawnhillchurch.org.uk](mailto:admin@chawnhillchurch.org.uk)

If you have any queries about this Privacy Notice or how we use your personal information, please contact our Operations Manager by;

- phoning 01384 397287
- emailing [admin@chawnhillchurch.org.uk](mailto:admin@chawnhillchurch.org.uk)

- **addressing all correspondence to:**  
**FAO: Operations Manager**  
Chawn Hill Church  
Chawn Hill  
Stourbridge  
West Midlands  
DY9 7JD