

## **PRIVACY NOTICE**

Welcome to St Mary's privacy notice.

St Mary's respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below. Alternatively you can download a pdf version of the policy here ([www.stmaryssawston.org.uk/contact-us](http://www.stmaryssawston.org.uk/contact-us)). Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

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## **1. IMPORTANT INFORMATION AND WHO WE ARE**

### **PURPOSE OF THIS PRIVACY NOTICE**

This privacy notice aims to give you information on how St Mary's collects and processes your personal data, including any data you may provide through attending a service or event organised by St Mary's.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

### **CONTROLLER**

St Mary's is the controller and responsible for your personal data (collectively referred to as "St Mary's", "we", "us" or "our" in this privacy notice).

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out

below.

## CONTACT DETAILS

Our full details are:

St Mary's Church, Church Lane, Sawston, Cambridge, CB22 3JR / 01223 837 298 (Church Office) / [stmaryssawston@btinternet.com](mailto:stmaryssawston@btinternet.com).

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

This version was last updated on 25 May 2018.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## THIRD-PARTY LINKS

This website may include links to third-party websites. Clicking on those links may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## 2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, marital status, title, date of birth and gender.
- **Contact Data** includes address, email address and telephone numbers.
- **Financial Data** includes bank account details.

## 3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - request a service to be held at St Mary's;

- subscribe to our publications;
  - request information about services and events of interest to be sent to you;
  - join a group or committee connected with St Mary's;
  - set up a regular standing order or direct debit to St Mary's; or
  - give us some feedback.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
  - Identity and Contact Data from publicly available sources such as the Electoral Register, Baptismal Register, Burials Register and Wedding Register.

#### 4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we have obtained your consent.
- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

#### PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate and the period of time that we expect to store your data.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>	<b>Period of time that data is stored</b>
To arrange and conduct services at St Mary's (for example, baptisms, confirmations, weddings, funerals)	(a) Identity (b) Contact	(a) Consent (b) Performance of a contract with you (c) Public task	We will store this data for a period of 5 years following the date of the service in question.
To record details of services held at St Mary's (for example, baptismal records, baptism register, confirmation register, wedding register, burials register, services register)	(a) Identity (b) Contact	(a) Consent (b) Public task (c) Necessary for our legitimate interests (keeping records of services	We are required to enter some categories of Identity data in various registers, which

		held at St Mary's)	are stored in the Church and copies of which are eventually archived by the Diocese of Ely once the particular register becomes full (in some cases, the original register will remain in the Church). This data will therefore be stored indefinitely by the Church and the Diocese of Ely.
To comply with archiving requirements of the Church of England	(a) Identity (b) Contact	(a) Public task  (b) Necessary for our legitimate interests (complying with archiving requirements set by the Church of England)	We are required by the Church of England to archive copies of certain registers when they become full. Once archived the data will be stored indefinitely by the Diocese of Ely.
To record emergency contact details in the case of minors (under 13)	(a) Identity (b) Contact	(a) Consent (in the case of minors, consent will be obtained from a parent)	We will store this data until one year after the minor in question stops attending a group/event organized by the Church or they become an adult (whichever is sooner).
To receive gifts to St Mary's made via standing order/ direct debit / gift aid	(a) Identity (b) Contact	(a) Consent  (b) Necessary for our legitimate interests (to	We will store this data for a period of two years after the

	(c) Financial	recover amounts gifted to us)	benefactor cancels the standing order./ direct debit / gift aid
To record the details of beneficiaries of any Church funds	(a) Identity (b) Contact	(a) Consent  (b) Necessary for our legitimate interests (to ensure funds are properly passed to beneficiaries)	We will store this data for a period of two years after the beneficiary has received funds.
To make suggestions and recommendations to you about events, services, groups or committees that may be of interest to you	(a) Identity (b) Contact	(a) Consent  (b) Necessary for our legitimate interests (to develop our network of members and grow our Church)	We will store this data until notified by you that you no longer wish to receive such suggestions/ recommendations..

### **COMMUNICATIONS FROM ST MARY'S**

We may use your Identity and Contact Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services and events may be relevant for you.

You may receive communications from us if you have requested information from us or attended a service at St Mary's and, in each case, you have not opted out of receiving that communication.

### **THIRD-PARTY COMMUNICATIONS**

We will get your express opt-in consent before we share your personal data with any third-party except as permitted by law.

### **OPTING OUT**

You can ask us or third parties to stop sending you communications at any time by contacting us (see contact details above).

### **CHANGE OF PURPOSE**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in

compliance with the above rules, where this is required or permitted by law.

## **5. DISCLOSURES OF YOUR PERSONAL DATA**

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Internal Third Parties as set out in the *Glossary*.
- External Third Parties as set out in the *Glossary*.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **6. INTERNATIONAL TRANSFERS**

We do not transfer your personal data outside the European Economic Area (**EEA**).

## **7. DATA SECURITY**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to members of St Mary's and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **8. DATA RETENTION**

### **HOW LONG WILL YOU USE MY PERSONAL DATA FOR?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are set out in the table in paragraph 4 above.

## **9. YOUR LEGAL RIGHTS**

Under certain circumstances, you have the following rights under data protection laws in relation to your personal data.

- *Request access to your personal data*

- *Request correction of your personal data*
- *Request erasure of your personal data*
- *Object to processing of your personal data*
- *Request restriction of processing your personal data*
- *Request transfer of your personal data*
- *Right to withdraw consent*

If you wish to exercise any of the rights set out above, please contact us. If contacting us via email or post, please include the words "Request – personal data" in the subject line in order that we may deal with it as a priority.

### **NO FEE USUALLY REQUIRED**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### **WHAT WE MAY NEED FROM YOU**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **TIME LIMIT TO RESPOND**

We try to respond to all legitimate requests within 14 days. Occasionally it may take us longer if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **10. GLOSSARY**

### **LAWFUL BASIS**

**Legitimate Interest** means the interest of St Mary's in conducting and managing our Church to enable us to give you the best experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

### **THIRD PARTIES**

#### **INTERNAL THIRD PARTIES**

- Priest-in-Charge of St Mary's.
- Church Wardens acting as processors based in the United Kingdom who provide services to the Church.

## **EXTERNAL THIRD PARTIES**

- Service providers acting as processors based in the United Kingdom who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- The Diocese of Ely acting as processor or joint controller which provides archiving services.

## **YOUR LEGAL RIGHTS**

You have the right to:

**Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.