

# TRINITY LIFE CHURCH, ROYSTON DATA PRIVACY POLICY

POLICY STATEMENT – UPDATED FEBRUARY 2019

## Introduction

Trinity Life Church, Royston (TLC) is committed to protecting and respecting your privacy.

This policy 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, i.e. you, the person whose data we are discussing.

### **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). TLC collects special categories of personal data for the vital interests of the person. This includes dietary and allergy information when working with children in specific TLC meetings.

**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.

## 2. Who are we?

Trinity Life Church, Royston is the data controller. This means we decide how your personal data is processed and for what purposes.

Our contact details are: PO BOX 123, Royston, Hertfordshire, SG8 5ZS or telephone 01763 230350. For all data matters contact [dataofficer@tlcroyston.org.uk](mailto:dataofficer@tlcroyston.org.uk) at the aforementioned address.

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

This personal data is required to enable us to keep you informed about our activities and events as Trinity Life Church, Royston (TLC) and to allow you to support us in our work in Royston and the surrounding areas if you should choose to do so and also to fulfil our legal requirements.

You are under no statutory or contractual requirement or obligation to provide us with your personal data. But if you do not provide personal data to us, it may prevent us from keeping you informed as to the work we carry out. We process data in the following ways:

#### **Data is processed for people who agree to volunteer within Trinity Life Church Royston for the purposes of being part of a volunteer rota.**

- Personal data such as name, address, telephone number, email address are retained and stored securely on our internal systems.
- Our legal basis for holding and processing this data is that you have provided your consent to it being held in order that we can communicate with you and you can engage in church life and become involved by serving the Church body.

#### **Data is processed for employees of and suppliers of services to Trinity Life Church Royston in order to comply with employment law.**

- Personal data such as name, address, telephone number, email address and bank details are retained and stored securely on our internal systems. Employment records include contracts, dates, rates of pay, records of appraisals and relevant communications.
- Our legal basis for holding and processing this data is that we have a legal obligation to do so.

#### **Data is used in order to carry out market research or assist with website customisation in order to improve the quality of the information and service we offer to members and friends of Trinity Life Church and to impact lives of people living in and around Royston.**

- Personal data such as name, address, telephone number, email address are retained and stored securely on our internal systems. When you use our website, we use cookies to help simplify and enhance the user experience of our website. We collect IP and browser information for the same purpose, as well as to ensure high levels of security on our website.
- Our legal basis for holding and processing this data is that you have provided your consent to us to use this data along with our own legitimate interest to keep you notified about things going on within TLC.

#### **Data is processed to operate the accounts and charitable reporting duties of the organisation.**

- Personal data is collected such as name, address, email address and telephone numbers. Bank details are stored and retained securely on our internal systems if you donate financially to TLC or ask for expenses to be repaid direct to your bank. We will also hold data relating to your HMRC reference for the purposes of reclaiming gift aid where permission has been given for this by you.
- Our legal basis for processing this data is that you have provided your consent to us holding and processing this information as it has all been provided by you directly. For certain aspects we have a legal obligation to hold and process items of data as we are required to provide HMRC with details of all donors on gift aid claims that we make.

**Data is processed to enable us to provide church-based services such as children's work on Sunday mornings.**

- Personal data is collected on children and young people attending children and youth work either on a Sunday morning or at other times during the week. The data collected is their name, age and details of the parent responsible for them during the time they are with our children and youth workers.
- Our legal basis for collecting and processing this data is it is necessary for compliance with our legal obligation to protect and safeguard children, especially in the event of any disclosure made by a child. We are also required by law to retain data relating to health and safety requirements and risk assessments in the event of any incident or accident that may occur.

**Data is processed to provide community services such as Make Lunch and other community projects.** Please refer to the separate Make Lunch Privacy Policy which can be found on our website [www.tlcroyston.org.uk](http://www.tlcroyston.org.uk) for more information specifically relating to this project which has its own set of Data Policies. There will from time to time be other community projects TLC becomes engaged in. This data policy will apply to the handling of all data relating to data received and processed under any community project run by TLC. This will not necessarily be the case if TLC run a project in conjunction with another organisation who is spear heading the project.

**Data is processed to enable us to organise events [such as lists of who is coming]**

- Data which is held and processed will include your name, your address, email address, telephone number.
- The legal basis upon which we will collect, hold and process your data is that you have given your consent for this to happen.

## **6. Promotional Communications**

We may use your personal data to send you updates (by email, text message, telephone or post) about courses or events that might be of interest to you and / or information about our services.

You have the right to opt out of receiving promotional communications at any time by

- Unsubscribing via the website
- Emailing [yourdata@tlcroyston.org.uk](mailto:yourdata@tlcroyston.org.uk)

## **7. Sharing your personal data**

Your personal data will be treated as strictly confidential and will only be shared with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

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

We keep all your personal data for no longer than reasonably necessary or for a minimum period of 3 years from the last point of contact we had with you.

Where we are required to retain records required by law for example in relation to HMRC Gift Aid claims or safeguarding / DBS disclosures or reports in respect of children we keep data for as long as is required by those statutory or regulatory bodies.

## **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;
- 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)

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

Personal data, such as name and email, is collected with your permission to contact you in regard to a query sent through our website or as log in details to be able to access TLC Online Services. This data is stored in secure data centres across Europe and the United States. No other personal or sensitive data is transferred outside the EEA (European Economic Area).

## **11. Automated Decision Making**

We do not use any form of automated decision making in our business.

## **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**

We hope that we will be able to resolve any issues or complaints in the first instance. To exercise all relevant rights, queries or complaints please email [dataofficer@tlcroyston.org.uk](mailto:dataofficer@tlcroyston.org.uk) or write to PO Box 123 Royston, Hertfordshire, SG8 5ZS.

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.