

## **PRIVACY NOTICE**

### **Brookside Church/Living Hope Trust**



#### **Your personal data – what is it?**

“Personal data” is any information about a living individual which allows them to be identified from that data (for example a name, photographs, videos, email address, or address). Identification can be by the information alone or in conjunction with any other information. The processing of personal data is governed by *[the Data Protection Bill/Act 2017 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?**

Brookside Church is part of Living Hope Trust, a registered charity, and we may need to share personal data in order to carry out our responsibilities to the church and our community. We are joint data controllers (address below). This means we are both responsible to you for how we process your data. This Privacy Notice is sent to you on behalf of both of these data controllers. In the rest of this Privacy Notice, we use the word “we” to refer to each data controller, as appropriate.

#### **What data do the data controllers listed above process?**

We will process some or all of the following where necessary:

- Names, titles, and aliases, photographs;
- Contact details such as telephone numbers, addresses, and email addresses;
- Where they are relevant to our vision, or where you provide them to us, we may process demographic information such as gender, age, date of birth, marital status, nationality, education/work histories, academic/professional qualifications, hobbies, family composition, and dependants;
- Where you make donations or pay for activities or events, financial identifiers such as bank account numbers, payment card numbers, payment/transaction identifiers, policy numbers, and claim numbers
- The data we process is likely to constitute sensitive personal data because, as a church, the fact that we process your data at all may be suggestive of your religious beliefs. Where you provide this information, we may also process other categories of sensitive personal data: racial or ethnic origin, sex life, mental and physical health, details of injuries, medication/treatment received, political beliefs, data concerning sexual orientation and criminal records, fines and other similar judicial records.

#### **How do we process your personal data?**

We will comply with our 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.

We use your personal data for some or all of the following purposes:

- To promote, fundraise and manage the activities of the church and trust
- To enable us to meet all legal and statutory obligations (which include managing employees and processing gift aided giving);
- To promote and manage our activities
- To carry out safeguarding procedures (including due diligence and complaints handling) in accordance with best safeguarding practice from time to time with the aim of ensuring that all children and adults-at-risk are provided with safe environments;
- To minister to you and provide you with pastoral and spiritual care (such as visiting you when you are gravely ill or bereaved) and to organise and perform ecclesiastical services for you, such as weddings and funerals;
- To deliver the church’s vision to our community, and to carry out any other voluntary or charitable activities for the benefit of the public;
- To manage our employees and volunteers;
- To facilitate sharing of personal data amongst church attendees;

- To maintain our own financial accounts and records;
- To process a donation that you have made (including Gift Aid information);
- To seek your views or comments;
- To notify you of changes to our services, activities, events and role holders;
- To send you communications which you have requested and that may be of interest to you. These may include news; information about activities, events, services; and fundraising activities run by us or other churches, charities and organisations connected to Reading Christian Network
- To enable us to provide a voluntary service for the benefit of the public in the local area.

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

Most of our data is processed because it is necessary for our legitimate interests. An example of this would be our safeguarding work to protect children and adults at risk. We will always take into account your interests, rights and freedoms.

Some of our processing is necessary for compliance with a legal obligation. For example, to carry out our legal obligations in relation to Gift Aid, or under employment, social security or social protection law.

We may also process data if it is necessary for the performance of a contract with you, or to take steps to enter into a contract.

Religious organisations are also 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.

Processing is carried out by a not-for-profit body with a political, philosophical, religious or trade union aim provided:

- i. the processing relates only to members or former members (or those who have regular contact with it in connection with those purposes);
- ii. and ii) there is no disclosure to a third party without consent.

### **Sharing your personal data**

Your personal data will be treated 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):

- Our agents, servants and contractors. For example, we may ask a commercial provider to send out newsletters on our behalf, or to maintain our database software;
- On occasion, other churches with which we are carrying out joint events or activities.

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

In general, we will endeavour to keep data only for as long as we need it. This means that we may delete it when it is no longer needed. Specifically, we retain gift aid declarations and associated paperwork for up to 6 years after the calendar year to which they relate; and marriage registers permanently. It is current best practice to keep financial records for a minimum period of 7 years to support HMRC audits.

### **Your rights and 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:

1. The right to access information we hold on you

- At any point you can contact us to request the information we hold on you. 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.
2. 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.
  3. 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 inform you if there is a reason why it cannot be deleted (for example because we need it for our legitimate interests or regulatory purpose(s)).
  4. 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.
  5. 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.
  6. The right to withdraw your consent to the processing at any time for any processing of data to which consent was sought.
  7. The right to object to the processing of personal data where applicable.
  8. The right to lodge a complaint with the Information Commissioner's Office.

### **Transfer of Data Abroad**

Any electronic personal data transferred to countries or territories outside the EU will only be placed on systems complying with measures giving equivalent protection of personal rights either through international agreements or contracts approved by the European Union. Our website is also accessible from overseas so on occasion some personal data (for example in a newsletter) may be accessed from overseas.

### **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.

### **Contact Details**

To exercise all relevant rights, queries of complaints please in the first instance contact the Church Office:  
[info@brooksidechurch.org.uk](mailto:info@brooksidechurch.org.uk) tel. 0118 966 4474

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.