



PRIVACY POLICY

St Paul's and St George's Church

Definition of Terms	
UK GDPR	General Data Protection Regulation (GDPR): Created by the EU to give consumers control of the personal information (data) that companies collect and use. The regulation has been enforced from May 2018. In anticipation of Brexit, a new domestic data privacy law called the UK GDPR took effect on January 31, 2020, and – alongside the Data Protection Act (DPA) of 2018 and the PECR – governs all processing of personal data from individuals located inside the United Kingdom.
ICO	Information Commissioners Office: the UK Government department responsible for deciding how the law is interpreted in the UK and prosecuting organisations which do not comply.
DPA	Data Protection Act 2018 (DPA 2018): the current UK law that regulates how organisations collect and use consumer information.
Legitimate Interest	This is one of the six bases we can rely on to process personal data. It means that we have a reasonable reason to process the data in the running of the organisation that the subjects are part of.
Data Controller	The person/people in the organisation who determines the purposes and means of processing personal data.

1. Your personal data – what is it?

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession. The processing of personal data is governed by the UK GDPR.

2. Who are we?

The Vestry of Ps & Gs and the Clergy are each a data controller (contact details below). This means they each decide how your personal data is processed and for what purposes.

3. How do we process your personal data?

The Vestry of Ps & Gs and the Clergy comply with their obligations under the UK GDPR and DPA 2018 by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical and organisational measures are in place to protect personal data.

The Clergy will use your personal data in order to provide pastoral care to you and to administer records required under Canon Law e.g. membership list.

The Vestry use your personal data for the following purposes: -

- To administer membership records;
- 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);
- To inform you of news, events, activities and services running at Ps & Gs and in the broader Church;
- To share your contact details with the diocesan office if you are appointed to a role within the congregation or diocese for the purposes of church administration;
- To share your contact details with the General Synod Office if you are appointed to a role within the congregation or diocese for the purposes of church administration;
- To enable us to provide a voluntary service for the benefit of the public.

4. What is the legal basis for processing your personal data?

Explicit **consent** of the data subject;

This is so that we can keep you informed about news, events, fundraising, activities and services

Contract: If you are an employee of the Vestry and the processing is necessary for carrying out obligations under employment, social security or social protection law, or a collective agreement;

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

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

Processing is necessary for our **legitimate interests**. This means that we can process your personal data if (i) we have a genuine and legitimate reason; and (ii) are not harming any of your rights and interests.

Our legitimate interests include: processing for the purposes of church administration; processing your gift aid donations; fundraising;

5. Sharing your personal data

Your personal data will be treated as strictly confidential and will be shared only as set out in this section. Your personal data may be shared with members of the Vestry and clergy and staff of Ps & Gs, and, if you are appointed to a role within the congregation or diocese, with the General Synod Office.

If you serve on any committee or take on any duty, rota or role within the congregation, your personal data may be shared with other members of the congregation.

We may also share your information or disclose it to third parties where required to comply with any court order or other legal obligation or when data is requested by government or law enforcement authorities, to enforce any agreements, or to protect the rights, property, or safety of us, members of the congregation or others.

6. How long do we keep your personal data?

We keep data in accordance with the guidance provided by the Scottish Episcopal Church.

Specifically, we retain members' and regular attenders' data while it is still current, this is regularly updated; gift aid declarations and associated paperwork for up to 7 years after the tax year to which they relate; and church registers (baptisms, marriages, funerals) permanently.

7. Your rights and your personal data

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

- The right to request a copy of your personal data which the Clergy/Vestry of Ps & Gs holds about you;
- The right to request that the Clergy/Vestry of Ps & Gs corrects 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 for the Clergy/Vestry of Ps & Gs to retain such data;
- The right to withdraw your consent to the processing at any time
- The right to request that the data controller provide the data subject with his/her personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable) [*Only applies where the processing is based on consent or is necessary for the performance of a contract with the data subject and in either case the data controller processes the data by automated means*].
- 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) [*Only applies where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics*]
- The right to lodge a complaint with the Information Commissioner's Office.

8. Further processing

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

9. Contact Details

To exercise all relevant rights, queries or complaints please contact the Church Office or Andrew Marrian (Data Protection Officer) at office@psandgs.org.uk

Ps & Gs Church Office

10 Broughton Street
Edinburgh
EH1 3RH
Tel: 0131 556 1335.

You can contact the [Information Commissioner's Office via their website](#)

Or by post:

Information Commissioner's Office

Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

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