

# St Edmundsbury Cathedral



## PRIVACY INFORMATION NOTICE

### The Chapter of St Edmundsbury Cathedral

What is the purpose of this document?

1. The Chapter of St Edmundsbury Cathedral is a data controller (our contact details can be found below). This means it is responsible for deciding how we hold and use personal data. We are required under the data protection legislation to notify you of the information contained in this privacy notice.
2. This notice applies to volunteers, members of our groups and members of the public.
3. This notice does not form part of any contract, and we may update this notice at any time.
4. It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.
5. We will comply with the Data Protection Act 2018. This says that the personal information we hold about you must be:
  - a) Used lawfully, fairly, and in a transparent way.
  - b) Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
  - c) Accurate and kept up to date.
  - d) Kept only as long as necessary for the purposes we have told you about.
  - e) Kept securely.
  - f) Does not sell or pass on data unlawfully.

Your personal data – what data do we collect, store and use, and how do we collect it?

6. Personal data or personal information means any information about an individual from which that person can be identified, including photographic and video content. It does not include data where the identity has been removed (anonymous data). Personal data includes: names, postal addresses, email addresses, telephone numbers.
7. There are "special categories" of more sensitive personal data which require a higher level of protection. This includes financial data from one-off or regular donations.
8. The Cathedral will at all times be aware of the sensitivity of information gathered and held on individuals and organisations and ensure that information acquired via all channels, particularly information not in the public domain, is treated with the utmost respect.

9. If you join any of the groups affiliated to the Cathedral, we may store the information that you provide, including your name, email address, postal address and telephone number.
10. If you sign up to receive emails from us, then we collect and store your name and email address only.
11. If you make a one-off donation or regular donations, we may collect your banking details and your contact details from the information that you provide. We may also record any correspondence relevant to that donation, membership details, and any gift in will agreements.
12. We may record information about a donor's willingness and capacity to support the Cathedral, which may be provided by the donor or from information in the public domain.
13. We may also collect information about your use of our websites, including your IP address, how much time you spend on the site, and which pages you view.
14. We do not envisage that we will hold information about criminal convictions.

How do we use or process your personal data?

15. We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:
  - a) Where we need to perform the contract, we have entered into with you.
  - b) Where we need to comply with a legal obligation.
  - c) 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.
16. We may also use your personal information in the following situations, which are likely to be rare:
  - a) Where we need to protect your interests (or someone else's interests).
  - b) Where it is needed in the public interest or for official purposes.
17. We use your personal data for the following purposes:
  - a) We may use your contact details to send you information about the work of the Cathedral and its groups, (including promotional activities and fundraising) if you have given consent to receive mailings from us.
  - b) We use your banking details to process donations you have made to us, and contact details to acknowledge such donations.
  - c) For memberships, we may use your personal data to administer our records and contact you regarding membership renewal;
  - d) Sometimes it is necessary for us to process your data to meet our legal obligations, for example when we send data to HMRC to claim Gift Aid.
  - e) When you give us your personal information in connection with making a donation, we will also use this information (never your financial information)

for internal reporting and analysis. Please see the section on Legitimate Interests for a description of this processing.

- f) To manage our employees and volunteers.
18. Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.
  19. You are not required to provide personal data to us. However, if you fail to provide us with certain information when requested, this may affect our ability to provide the services you request (for example, we are unable to receive a donation from you if you do not provide your payment information) or our contract with you, and we may be prevented from complying with our legal obligations (for example, in relation to health and safety).
  20. You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making (this takes place where an electronic system use personal information to make a decision without human intervention), unless we have a lawful basis for doing so and we have notified you.

What is the legal basis for processing your personal data?

21. Your explicit consent, so that we can keep you informed about Cathedral news, events, activities and services, and process your Gift Aid donations. We give very clear information on our signup form on our website that sets out permissions for mailing lists: <https://stedscathedral.org/consent/>
22. For volunteers, we process your personal data to enable us to efficiently and effectively manage your work with us in accordance with our legitimate interests and legal obligations.
23. For members of other groups, we may process your personal data in connection with internal reporting and analysis because we believe it is necessary for our legitimate organisational interests in creating better events and better communications.
24. For members and donors, processing personal data enables us to carry out reasonable administration, better understand our supporters to inform future decisions, and minimise our administration costs by only asking a donor for further support if it is appropriate. To claim Gift Aid on donations, we are required to send personal data to HMRC.
25. We have conducted a legitimate interest assessment to ensure that this processing is not overridden by your rights or interests. We employ safeguards, such as formal data governance programme, to protect your privacy. To opt out of this processing, please see our section on Your Rights (paragraph 29 – 35).
26. Processing is carried out by a not-for-profit body with a political, philosophical, religious or trade union aim provided:
  - a) the processing relates only to members or former members (or those who have regular contact with it in connection with those purposes); and
  - b) there is no disclosure to a third party without consent.

## Sharing your personal data

27. We will only share your data with third parties outside of the parish with your consent. However, we may need to share your personal information with a regulator or third party to comply with the law, where it is necessary to administer our relationship with you, or where we have another legitimate interest in doing so. This may include members of the church in order to carry out a service to other church members, or for purposes connected with the church.

## How long do we keep your personal data?

28. We will only retain your personal information 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. We keep data in accordance with the guidance set out in the guide “Keep or Bin: Care of Your Parish Records” which is available from the Church of England website. This guidance helps us determine the appropriate retention period for 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.
29. With donors and supporters, we consider our relationship to be lifelong and we will retain most of your data unless you request otherwise. We rely on family members or friends letting us know if someone has died and will archive them as appropriate.

## Closed Circuit Television (CCTV)

30. Our processing also includes the use of CCTV systems for the prevention and prosecution of crime, the prevention of anti-social behaviour, the prevention of bullying, for the safety of our staff and for the protection of the Cathedral and its property.
31. All CCTV systems and associated equipment will be required to be compliant with the Cathedrals CCTV policy. Recognisable images captured by CCTV systems are “personal data” and are therefore subject to the provisions of the Data Protection Act 2018.
32. The Data Protection Act 2018 requires that data is "adequate, relevant and not excessive" for the purpose for which it is collected. This means that Chapter need to be able to justify the obtaining and use of personal data by means of a CCTV system. The use of CCTV to control the perimeter of the Cathedral for security purposes has been deemed to be justified by Chapter. The system is intended to capture images of intruders or of individuals damaging property or removing goods without authorisation.

## Your rights and your personal data

33. It is important that the personal information that we hold about you is accurate and current. Please keep us informed if your personal information changes.
34. Unless subject to an exemption under UK GDPR, you have the following rights with respect to your personal data:
  - a) The right to request a copy of your personal data which The Chapter of St Edmundsbury Cathedral holds about you;
  - b) The right to request that The Chapter of St Edmundsbury Cathedral corrects any personal data if it is found to be inaccurate or out of date;
  - c) The right to request your personal data is erased where it is no longer necessary for The Chapter of St Edmundsbury Cathedral to retain such data or where you have exercised your right to object to the processing;
  - d) The right to request a restriction is placed on further processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it;
  - e) The right to object to the 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. You also have the right to object where we are processing your information for direct marketing purposes;
  - f) The right to lodge a complaint with the Information Commissioners Office; and
  - g) The right to request the transfer of your personal information to another party.
35. If you would like to review, verify, correct, or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact our Data Protection Lead in writing. See point 42.
36. You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.
37. We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.
38. In the limited circumstances where you may have provided your consent to the collection, processing, and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact our Data Protection Lead. Once we have

received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

39. 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. The contact details can be found at the end of this notice.

#### Further processing

40. We will only use your personal information 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 we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Where possible, we will seek your prior consent to the new processing purpose.
41. 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.

#### Data Security

42. We have put in place measures to protect the security of your information. Details of these measures are available upon request.
43. Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.
44. We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

#### Contact Details

45. To exercise all relevant rights, queries of complaints please in the first instance contact the Data Protection Lead [dataprotectionlead@stedscathedral.org](mailto:dataprotectionlead@stedscathedral.org)
46. 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.

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