



# DATA PROTECTION: PRIVACY POLICY

This Notice outlines the way in which the Congregation will use personal information provided to us. Personal information includes any information that identifies you personally, such as your name, address, email address or telephone number.

The Congregation recognises the importance of your privacy and personal information and we have therefore outlined below how we use, disclose and protect this information. The Congregation, jointly with the Presbytery of Lothian is the data controller, because we decide how your data are processed and for what purpose. Contact details for us are provided below.

#### **How We Collect Information**

The congregation receives and stores personal information provided by members, employees, volunteers, donors and other associates. This information can be supplied to us:

- in writing or via email, by telephone conversation or on our website (e.g. when an individual is becoming a member); or
- by otherwise associating with the congregation or its organisations, (e.g. by enquiring about our work, activities, employment and volunteering opportunities); or
- when donating money to the congregation or its organisations.

We may also receive information about you from third parties.

#### How we use information

We use the information you give to us:

- to administer membership records, including a Communion Roll and Supplementary Roll;
- for pastoral care purposes;
- in relation to participation in Congregational activities;
- to provide you with information about news, events, and activities within the Congregation or the wider Church of Scotland;
- to provide the services of a parish church to the local community;
- to fulfill contractual or other legal obligations;
- to further our charitable aims, for example through fundraising activities;
- to maintain our accounts and records (including the processing of Gift Aid applications);
- for internal administration, or for analysing how we may better advance the Kingdom of God.

#### Disclosure of information

The Congregation will only share your personal information where this is necessary for the purposes set out above. Information will not be shared with any third party outwith the Church of Scotland without your consent unless we are obliged or permitted to do so by law.

## Basis for processing personal information

The Congregation processes your information in the course of its legitimate activities, with appropriate safeguards in place, as a not-for-profit body with a religious aim and on the basis that

our processing relates solely to members, former members or people who have regular contact with us, and that this information is not disclosed to any third party without your consent.

We also process information where this is necessary for compliance with our legal obligations; where processing is necessary for the purposes of our legitimate interests and such interests are not overridden by your interests or fundamental rights and freedoms; and where you have given consent to the processing of your information for a particular purpose.

### Storage and security of personal information

The Congregation will strive to ensure that personal information is accurate and held in a secure and confidential environment. We will keep your personal information for as long as you are a member or adherent or have regular contact with us or so long as we are obliged to keep it by law or may need it in order to respond to any questions or complaints or to show that we treated you fairly. We may also keep it for statistical purposes but if so we will only use it for that purpose. When the information is no longer needed it will be securely destroyed or permanently rendered anonymous. Further information about our data retention policy is available in the first instance by requesting such through your District Elder or the Session Clerk.

## Getting a copy of your personal information

You can request details of the personal information which the Congregation holds about you by requesting such through your District Elder or the Session Clerk.

## **Inaccuracies and Objections**

If you believe that any information the Congregation holds about you is incorrect or incomplete or if you do not wish your personal information to be held or used by us please let us know. Any information found to be incorrect will be corrected as quickly as possible.

You have the right to object to our use of your personal information, or to ask us to remove or stop using your personal information if there is no need for us to keep it. There may be legal or other reasons why we need to keep or use your data, but please tell us if you think that we should not be using it.

We are holding your details on the assumption that we have your consent to do so.

If for any reason you do not wish us to continue to do so you can withdraw your consent at any time. Please contact us if you want to do so. You can contact us by getting in touch with your District Elder or the Session Clerk, who will pass your request on to the Roll Keeper who will ensure any data referring to yourself will be removed. You should be aware that if you do this it will inhibit us from keeping in touch with you.

### How to complain

You have the right to complain to the Information Commissioner's Office about anything relating to the processing of your personal information by the Congregation. You can contact the ICO via its website at <a href="https://www.ico.org.uk">www.ico.org.uk</a> or at Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

Approved by Kirk Session: 13th September 2018