

Benefice Privacy Policy

1. Introduction

This privacy policy is for The Parochial Church Councils (PCCs) of The United Benefice of Orsett, Bulphan and Horndon-on-the-Hill, and the websites hobnob.org.uk and hobnobchurches.org. It explains how we comply with the General Data Protection Regulation (the GDPR) and the Privacy and Electronic Communications Regulations (the PECR). The PCCs of The United Benefice are the data controllers (contact details below). This means they decide how your personal data is processed and for what purposes.

2. 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.

3. How do we collect your personal data?

We collect personal data in various ways:

- **Direct Interaction.** We may collect—or be given—personal data when communicating with you. This could be by post, phone, email, online or otherwise. This also includes when you enter information into our website.
- **Automated Technologies or Interaction.** As you use and interact with our website, we may automatically collect technical data about your browser, equipment, browsing actions and browsing patterns. This is collected by cookies, server logs and other similar technologies.

4. How do we process your personal data?

The PCCs of the Benefice comply with their obligations under the GDPR and the PECR 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 measures are in place to protect personal data.

We use your personal data for the following purposes: –

- To enable us to provide a voluntary service for the benefit of the public as specified in our constitution;
- 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 in the Benefice;
- To share your contact details with the Diocesan office so they can keep you informed about news in the diocese and events, activities and services that will be occurring in the Diocese and in which you may be interested;
- To use data analytics to learn about how and why our website is used, and to aid its improvement. However, this usually involves using Aggregated Data (which may be derived from your personal data, but is not considered personal data as it does not reveal your identity);
- To respond to and protect against security threats to our online resources.

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

- Explicit consent of the data subject so that we can keep you informed about news, events, activities and services and process your gift aid donations and keep you informed about diocesan events.
- 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.

6. Sharing your personal data

Your personal data will be treated as strictly confidential and will only be shared with other members of the church in order to carry out a service to other church members or for purposes connected with the church. We will only share your data with third parties outside of the parish with your consent. However, through your use of our website, your personal data may be collected by third parties.

7. How long do we keep your personal data?

- 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 (at https://www.churchofengland.org/sites/default/files/2017-11/care_of_parish_records_keep_or_bin_-_2009_edition.pdf).
- Specifically, we retain electoral roll data while it is still current; gift aid declarations and associated paperwork for up to 6 years after the calendar year to which they relate; and parish registers (baptisms, marriages, funerals) permanently.

8. Your rights and your personal data

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

- The right to request a copy of your personal data which any of the PCCs hold about you;
- The right to request that the Benefice PCCs 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 for the Benefice PCCs 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 Commissioners Office (ICO).

9. Further processing

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

10. Our Website

Our online resources are hosted on a cloud platform called Microsoft Azure, and also by Vision Internet Limited. We use a Content Management System called WordPress to aid the management, administration and update of our website (and its add-ons and additional features). By default, WordPress itself does not collect Personal Data.

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our sites. (A 'cookie' is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.)

Therefore, in the use of our website (and online resources), there may be privacy implications:

- We may embed content from other websites and online services, like Google Maps and YouTube. This content behaves in exactly same way as if you had visited the other website, and may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with it.
- On our website and/or online resources, we may use a number of (third party) services to provide you with the best user experience (these may use cookies):
 - Several forms are available on the website, like the 'Contact Us' and 'Data Preferences' forms. The information you enter into these forms will be stored and/or sent to the relevant person, or processed automatically. Technical data such as your browser and equipment details, and IP address, may be stored alongside your entry.
 - We have implemented Google's reCAPTCHA on our website for security reasons. This helps to protect against malicious users, and bots. reCAPTCHA may not be visible when it is used. Completing forms or entering any information on our website—and therefore using reCAPTCHA—is subject to Google's Privacy Policy (<https://policies.google.com/privacy>) and Terms of Use (<https://policies.google.com/terms>).
 - Microsoft Azure allows us to provide a Single-Sign-On experience to our internal users, across our online resources. Login is via a service that is not located on our website. Whilst using Azure to sign in to any of our online resources—including our website—you are subject to Microsoft's Services Agreement (<https://www.microsoft.com/en-GB/servicesagreement/>) and Privacy Statement (<https://privacy.microsoft.com/en-GB/privacystatement/>).
 - Google Analytics allows us to collect information about how visitors use our website. We use the data to find general website usage information, see patterns about how our website is used. Google Analytics collects data in anonymous form. You can read

more, including how to opt out of Google Analytics, in Google's Privacy and Terms website (at <https://www.google.com/policies/privacy/partners/>).

These third-party services may all use cookies (and place them on your device).

11. Further processing

To exercise all relevant rights, queries or complaints please in the first instance contact the relevant PCC Secretary, whose details can be found at <https://www.hobnob.org.uk/people/>.

You can contact the Information Commissioner's Office on 0303 123 1113 or via email at casework@ico.org.uk or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

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