

DATA PRIVACY NOTICE

The Portsmouth Diocesan Board of Finance.

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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 General Data Protection Regulation (the "GDPR") and the Data Protection Act 2018.

Who are we?

The Portsmouth Diocesan Board of Finance (PDBF) is the administrative body for the Diocese of Portsmouth and is the registered data controller with the Information Commissioners Office (Registration Number: Z6181338). This means the PDBF decides how your personal data is processed and for what purposes.

How do we process your personal data?

The PDBF complies with its obligations under data protection laws 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. Your electronic data is stored on a cloud based IT system and its data centres are held in the UK.

The staff at the Diocesan office need to be able to get in touch with the key people in parishes and deaneries across the Diocese to help us provide a proper service to you.

We use your personal data for the following purposes: -

- To enable us to provide a voluntary service for the benefit of the public in a particular geographical area as specified in our constitution;
- For ministry and mission support (including the filling of vacancies);
- To administer membership records;
- To fundraise and promote the interests of the charity;
- To manage our employees, volunteers; board, committee, synod and deanery members.
- To maintain our own accounts and records (including the processing of gift aid applications);
- For work relating to pastoral reorganisation and the Church Representation Rules;
- For advice relating to church buildings, their development and maintenance;
- For work relating to parsonages and other housing and property management;
- For the provision of safeguarding training , vetting and advice;

- For educational work both in our church schools, academies and beyond;
- For publication of the Diocesan magazine and all the news and guidance on our website
- To inform you of news, events, training, services and other activities connected with PDBF;

What is our legal basis for processing your personal data?

The lawful bases for processing are set out in Article 6 of the GDPR

- Legal obligation - we are legally required to consult with key office holders such as clergy, PCC Secretaries, PCC Treasurers and Churchwardens and other role holders on matters affecting the Diocese.
- Contractual – where processing is necessary for the performance of the contract to which you the data subject is party to.
- Consent - where consent is the basis of holding your personal data.
- Legitimate interest – where the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.
- 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 religious aim and: -
 - 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 unless there is a legal basis to do so without consent.

Sharing your personal data

Your personal data will be treated as strictly confidential and will only be shared with other members of the Diocese where appropriate in order to carry out a service to other diocesan members (employees, clergy or lay volunteers) or for purposes connected with the diocese. We will only share your data with third parties outside of the Diocese if legally permitted to do so or as set out in Annexe A at the bottom of the page. We do not share information about our employees, volunteers, members with anyone unless the law or our policies allow us to do so. We will not share your information with any third parties for the purposes of direct marketing.

Sensitive Data

We only process sensitive data where it is necessary to do so in line with a legal lawful basis identified. We do not process any sensitive data without your permission to do so. Sensitive data includes the following categories:

- racial or ethnic origin
- political opinions
- religious or philosophical beliefs
- trade union membership
- physical or mental health or condition
- sex life or sexual orientation
- genetic data
- biometric data

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, the Portsmouth diocese retention Policy and legal requirements for retaining personal data.

Specifically, we retain HR data on employees while it is still current and proof of employment permanently. Gift aid declarations and associated paperwork for up to 6 years after the calendar year to which they relate.

Keeping your data up to date

We have a duty to keep your personal data up to date and accurate so from time to time we will contact you to ask you to confirm that your personal data is still accurate and up to date.

If there are any changes to your personal data (such as a change of address) please let us know as soon as possible by writing to or emailing the addresses set out at the bottom of this notice.

Storing personal data

We hold personal data securely, and only use/retain it for purposes for which it was collected until it is no longer required for this reason.

Your rights and your personal data

We will only keep your personal data for as long as is necessary to fulfil the purposes for which we collected it. We may retain your data to satisfy any legal, accounting, or reporting requirements so for example we need to keep certain information about you for 6 years after you cease to have a role for tax purposes.

You have the right to ask us to delete the personal data we hold about you in certain circumstances. See below.

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

- The right to request a copy of your personal data which the PDBF holds about you;
- The right to request that the PDBF 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 or legally required for PDBF to retain such data;
- The right to withdraw your consent, where consent was given to the processing of your data, at any time;
- 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)
- The right to lodge a complaint with the Information Commissioners Office.

You are able to exercise certain rights in relation to your personal data that we process. These are set out in more detail at <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

Requesting access to personal data (Subject Access Request)

In relation to a Subject Access Right request, you may request that we inform you of the data we hold about you and how we process it. We will not charge a fee for responding to this request unless your request is clearly unfounded, repetitive or excessive in which case we may charge a reasonable fee or decline to respond.

We will, in most cases, reply within one month of the date of the request unless your request is complex or you have made a large number of requests in which case we will notify you of any delay and will in any event reply within 3 months.

If you wish to make a Subject Access Request, please send the request to the address at the bottom of this form or email the diocesan.Secretary@portsmouth.anglican.org marked for the attention of the Data Compliance Officer.

International Transfers

We do not transfer your personal data outside the European Economic Area unless it is required of us or we have your consent to do so. Countries outside of the European Economic Area (EEA) do not always offer the same levels of protection to your personal data, so European law has prohibited transfers of personal data outside of the EEA unless the transfer meets certain criteria unless additional safeguards are put in place by us.

If we were to transfer your personal data out of the EEA, we will do our best to ensure a similar degree of security of data by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission; or
- Where we use certain service providers, we may use specific contracts or codes of conduct or certification mechanisms approved by the European Commission which give personal data the same protection it has in Europe; or
- Where we use providers based in the United States, we may transfer data to them if they are part of the EU-US Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

If none of the above safeguards is available, we may request your explicit consent to the specific transfer. You will have the right to withdraw this consent at any time.

Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know such data. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Further processing

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

Changes to our privacy policy

We keep our privacy policy under regular review and we will place any updates on our website. This privacy policy was last updated on 8th August 2018

Contact Details

We are committed to protecting your personal data but if for some reason you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk).

We would be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.

To exercise all relevant rights, queries, access or complaints please in the first instance contact the Diocesan Secretary either by email 'diocesan.secretary@portsmouth.anglican.org' or by Post 'Diocese of Portsmouth, First Floor, Peninsular House, Wharf Road, Portsmouth, PO2 8HB'

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.

Annexe A

Third parties with whom data may be shared

The Contact Management System which is a management information system is a shared resource between:

- The office of the Bishop of Portsmouth
- The Archdeacon of Isle of Wight
- The Archdeacon of Meon
- The Archdeacon of Portsmouth

- The Chancellor for the Diocese of Portsmouth
- The Diocesan Board of Education
- The Diocesan Board of Finance
- The office of the Diocesan Registrar
- The clergy and PCC officers within the Diocese (this includes deanery and diocesan synod members)

The contact details of Petitioners and/or applicants on individual applications will be shared, through the Online Faculty System (OFS):

- The Archdeacon of Isle of Wight
- The Archdeacon of Meon
- The Archdeacon of Portsmouth
- The Chancellor for the Diocese of Portsmouth
- The office of the Diocesan Registrar Statutory Consultees (The Church Buildings Council, Historic England, national Amenity Societies and local authorities)
- to facilitate the consideration of applications for either a Faculty or a Matter not requiring a Faculty under the Faculty Jurisdiction Rules

Clergy contact details will be provided:

- Periodically to Crockford's Clerical Directory
- When necessary, by the Diocesan Property Team to its representatives for the purpose of undertaking works of repair / Diocesan clergy housing and the letting of Diocesan properties
- To the relevant local authority (in respect of Council Tax) and utility companies (in respect of supplies of energy to the property)
- In compliance with our legal responsibilities