

# **Borough Green Baptist Church – Data Privacy Notice for Individuals Associated with the Church**

## **1. The purpose of this Privacy Notice**

Borough Green Baptist Church is committed to protecting the personal information (data) that it holds about all individuals who are associated with the church and to acting in accordance with the General Data Protection Regulation 2018 (GDPR). This privacy notice gives you details about the data that the church collects, uses and maintains ('processes') for various purposes associated with your relationship with the church and is being made available as required by the GDPR legislation.

## **2. Data Controller**

For the purposes of GDPR, the Elders and Deacons of the church (the Officers) are regarded collectively as the legal Data Controller. If you have any questions concerning the church's use of personal data or arising from this Privacy Notice, please contact the Officers on [data@bgbc.org.uk](mailto:data@bgbc.org.uk) or by writing to the Church Officers, Borough Green Baptist Church, High Street, Borough Green, Sevenoaks TN15 8BJ, or by leaving a message on the church answerphone on 01732 882624.

## **3. The information that we hold about you and why we hold it**

We process (that is, collect, use and maintain) your personal data mainly for the purpose of maintaining contact with you in relation to your attendance at our Sunday services or other meetings (e.g. the Women's Fellowship, Messy Church, Men's Prayer Breakfast), or because you submitted an enquiry to the church or responded to an invitation to attend a course or special event, or because you are a Contractor with whom we have, or have had, a working relationship. If you are a regular attender who has requested a church car park permit then we will also process your personal data in administering that scheme, and if you have chosen to participate on the flower rota or other rotas or signed up to join in with tasks and activities (such as work parties and visits to Westbank care home), then your data will be used in that context. If you have made, or continue to make, donations to the church via bank transfer and/or that have been Gift Aided then your data will be processed in relation to that giving. In the case of individuals whose spouses are church Members but they are not, the first names only of those individuals will be included in the Members' Directory which is circulated to Members only, but only once consent has been given for this. Data ordinarily processed for these purposes will include name and contact details (postal address, email address if supplied, home and/or mobile telephone number), information shared in a pastoral care setting (generally held only by the Elders and/or the Deacons), bank account or other financial information where necessary for administering Gift Aid and other giving or for the payment of contractors' invoices (generally only held by the Deacon responsible for the church's financial administration), and where relevant will also include car ownership details (for the issuing of car park permits). In the case of attendance at the Women's Fellowship, date of birth will also be processed. In some instances, we may also hold photographs in which you are included, but these will only be taken, kept and used (either internally or in publicity materials and/or on our website or social media channels) with your consent.

The information that is processed for these various purposes is almost always obtained directly from the data subjects themselves, although it is possible that in some aspects of pastoral care, information may be obtained from relatives/friends of the data subject or from healthcare professionals, shared in order to protect the vital interests of the data subject.

## **4. The legal bases for the church to process your personal information**

The GDPR legislation requires the church to state the legal basis upon which we can legitimately process your data. For almost all the purposes stated above, our legal basis is that it is necessary in the pursuit of the *legitimate interests* of the church. This means that individuals associated with the church would reasonably expect that such data would be processed to enable the church to maintain contact, provide

pastoral care, or to enable necessary administrative tasks to be carried out.

The processing of personal data for the purpose of administering Gift Aid giving is necessary as a **legal requirement**, as is the processing of personal data for safeguarding purposes, while the processing of health data may be justified on the basis of being in the **vital interests** of the data subject. The processing of personal data for church publicity purposes is by explicit **consent**, as is the inclusion of non-Members' first names in the Members' Directory where the spouse is a Member, which you are free to withdraw at any time (see section 8 below).

## 5. How and where your information is held

**Mailing lists** (postal and/or email addresses) may be maintained on computer or on paper by one or more church Members with responsibility for communicating with those associated with the church for various administrative reasons. Any Member holding such a list will ensure that it is held securely.

Any **correspondence** with church Officers relating to church matters (spiritual or practical) will be stored securely by the Officers (on paper or electronically).

**Responsibility rotas** covering such things as the provision of flowers or tea making duties are drawn up by designated Members, usually on a quarterly basis, that will contain peoples' first names only. These rotas may be displayed on a notice board in the church vestibule, back corridor and/or in the church office, as well as being distributed to those on the rota(s) (electronically or on paper) but will never be displayed outside the building in a public location.

**Task or Participant lists** may be drawn up in preparation for an internal or external event (such as a church work party, a special meal, a visit to Westbank Care Home or a conference), which may be displayed in the church vestibule or the church office, or may be maintained (electronically or on paper) by the Member administering the event. These would ordinarily contain first names only and would never be displayed outside the building in a public location.

**Notes containing personal data** taken by Elders or Deacons when meeting individually with people for reasons of pastoral care or church administration will be stored securely by the Officers.

A **Car Park Permit List** is maintained by the Officers that contains the names, vehicle descriptions and registration numbers for all those people to whom a church car park permit has been issued. Officers store this list securely (on paper or on computer) and one paper copy of this list is kept in the locked cupboard in the church office.

Church **publicity materials, outreach items, event reports** and **content for our website or social media channels** may contain peoples' photographs, personal testimonies and/or other personal data. Members responsible for compiling such material will store such data securely and gain the explicit consent of the individuals concerned before making that data public.

A **Members' Directory** is maintained by the church Officers and periodically distributed (electronically or on paper) to Members only. Although this principally contains Members' names, postal addresses, email addresses where relevant, telephone numbers and the day and month of Members' birthdays, it does also contain, by explicit consent, the first names only of Members' spouses if that spouse is a non-Member. It also contains, by parental consent, the day and month of any Members' children's birthdays (for children under the age of 18). Members have a duty to keep this Directory private and to store it securely, whether on paper or on a computer. One copy of this Directory is kept in the locked cupboard in the church office.

## 6. Sharing your personal information

As described above, some personal data is shared between Members and others who are associated with the church or may be displayed on an internal church noticeboard (first name only). Some data is shared

with third parties: where required by law; to protect the vital interests of an individual (e.g. in a health emergency); or where explicit consent has been given for such sharing (e.g. on the church website or in outreach material).

## **7. Retaining your information**

As a general rule, the church will retain your personal data for as long as it is needed for the purposes for which it was collected, or as long as is required by law. Contact data will be retained all the time that you wish to remain associated with the church, e.g. as an attender at Messy Church or the Men's Prayer Breakfast. Any data relating to financial issues must be retained for a minimum of 7 years.

## **8. Our responsibilities and your rights**

The church is committed to maintaining the security of your data and to that end most material containing personal data kept at the church will always be stored in the safe or the locked cupboard in the church office. Church Members responsible for managing mailing lists, responsibility rotas, task and participant lists and any other documentation containing personal data (whether on paper or held electronically) will do so with the security of that data in mind, taking necessary steps to prevent the disclosure or loss of that data to anyone outside the church who is not authorised to see it.

The church is also committed to keeping your data up-to-date, so while some documents are subject to periodic review by Officers to address this, those whose data we may hold are also asked to help the church by informing the Officers of any changes in personal data (such as a change of email address or phone number) so that where appropriate the necessary changes can be made. This is in fact your right – to request the correction of any inaccurate personal data – and we will make the necessary changes within 1 month of receiving the request.

In the case of personal data that is processed based on your explicit consent, you have a right to withdraw that consent at any time by contacting the Officers with that request.

You also have a right to request a copy of your personal data that is held by the church, which we will give you within 1 month of receiving your request, unless there are complexities that delay us, in which case we will notify you and keep you updated.

You have a right to request the erasure of your personal data, although this will only be possible if the purposes for which your data is being processed no longer exist. You also have the right to restrict the processing of your data and to object to the processing of your data if you believe it to be inaccurate or if you dispute the lawfulness of our processing. In any of these cases, you must contact the Officers to exercise any of these rights.