

## General Privacy Notice

**This privacy notice explains how the Carlisle Diocesan Board of Finance and Cumbria Christian Learning protect and manage any personal data that you share with us and that we hold about you, including how we collect, process, protect and share that data. The organisation is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations**

Each of the organisations above has a data controller and has their own tasks within the Church. A description of what data is processed and for what purpose is set out in this Privacy Policy. This Privacy Policy is provided on behalf of each of these data controllers. In the rest of this Privacy Policy, we use the word “we” to refer to each data controller, as appropriate. The organisation is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

### What information does the organisation collect?

The organisation collects and processes a range of information about you. This includes:

- your name, address and contact details, including email address and telephone number;
- Where they are relevant to our mission, or where you provide them to us, we may process demographic information such as gender, age, date of birth, marital status, nationality, education/work histories, academic/professional qualifications, employment details, family composition and dependents;
- Where you make donations or pay for activities, financial identifiers such as bank account numbers, payment card numbers, payment/transaction identifiers;

The data we process is likely to constitute sensitive personal data because, as a church, the fact that we process your data at all may be suggestive of your religious beliefs.

The organisation collects this information in a variety of ways. For example, data is collected through application forms or CVs; obtained from your passport or other identity documents such as your driving licence; from forms completed by you; from correspondence with you; or through interviews or other meetings.

In some cases, the organisation collects personal data about you from third parties, such as information from criminal records checks permitted by law.

Data is stored in a range of different places, including filing cabinets and the organisation's IT and email systems.

## **Why does the organisation process personal data?**

Most of our data is processed because it is necessary for our legitimate interests, or the legitimate interests of a third party (such as another organisation within the Church of England). Examples of this would be to deliver the Church's mission to our community; our safeguarding work to protect children and adults at risk; to carry out charitable work and fundraising; and to administer parish, deanery, archdeaconry and diocesan records. We will always take into account your interests, rights and freedoms.

Some of our processing is necessary for compliance with a legal obligation, for example the requirements of the Church Representation Rules include administering and publishing the electoral roll, and collating signing-in details to comply with Fire Regulations.

We may process data if it is necessary for the performance of a contract with you, or to take steps to enter into a contract. Examples of this would be processing your data in connection with attendance on a training course, and to process information relating to professional contractors and suppliers.

We may also seek your views or comments, and we may send you communications which you have requested and that may be of interest to you. These may include information about activities, campaigns, appeals other fundraising activities

As a religious organisation we are also permitted to process information about your religious beliefs to administer membership or contact details.

## **Who has access to data?**

Your personal data will be treated as strictly confidential. Your information will be shared internally and with our affiliated organisations where it is necessary for performance of the data controllers' tasks, or where you first give us consent. It is likely that we will need to share your data with some, or all, of the following:

- The appropriate bodies of the Church of England, including the other data controllers within the Church of England
- Our agents and contractors. For example, we may ask a commercial provider to maintain our database software
- Other clergy or lay persons nominated or licensed by the bishops of the Diocese of Carlisle to support the mission of the diocese. For example, our clergy are supported by rural deans and archdeacons who may provide confidential mentoring and pastoral support and undertake appraisals. Assistant or temporary ministers, including curates, deacons, licensed lay ministers, commissioned lay ministers or persons with Bishop's Permissions may participate in our mission alongside our regular clergy
- Other persons or organisations operating within the Diocese of Carlisle including, where relevant, the Diocesan Board for Education, Churches Trust for Cumbria and our ecumenical partners including the Salvation Army, the Methodist and United Reformed Churches

- Relevant educational partners where appropriate

Any electronic personal data transferred to countries or territories outside the EU will only be placed on systems complying with measures giving equivalent protection of personal rights either through international agreements or contracts approved by the European Union. Our website is also accessible from overseas so on occasion some personal data (for example on a contact detail page) may be accessed from overseas.

### **How does the organisation protect data?**

The organisation takes the security of your data seriously. The organisation has internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties.

Where the organisation engages third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

### **For how long does the organisation keep data?**

We will keep some records permanently if we are legally required to do so. We may keep some other records for an extended period of time. For example, it is current best practice to keep financial records for a minimum period of 7 years to support HMRC audits. In general, we will endeavour to keep data only for as long as we need it. This means that we may delete it when it is no longer needed.

### **Your rights**

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require the organisation to change incorrect or incomplete data;
- require the organisation to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing. When we receive your request we will confirm whether the data has been deleted or the reason why it cannot be deleted (for example because we need it for our legitimate interests or regulatory purpose(s));
- object to the processing of your data where the organisation is relying on its legitimate interests as the legal ground for processing. Upon receiving the request, we will contact you and let you know if we are able to comply or if we have legitimate grounds to continue to process your data. Even after you exercise your right to object, we may continue to hold your data to comply with your other rights or to bring or defend legal claims; and

- ask the organisation to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override the organisation's legitimate grounds for processing data.
- request that we transfer some of your data to another controller.

When exercising any of the rights listed above, in order to process your request, we may need to verify your identity for your security. In such cases we will need you to respond with proof of your identity before you can exercise these rights. There are no fees or charges for the first request but additional requests for the same data may be subject to an administrative fee.

If you would like to exercise any of these rights, please contact the Data Controller.

If you believe that the organisation has not complied with your data protection rights, you can complain to the Information Commissioner.

### **Further processing**

If we wish to use your personal data for a new purpose, not covered by this Privacy Policy, then we will provide a new policy 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 this policy**

We keep this Privacy Policy under regular review and we will place any updates on the website [www.carlisle-diocese.org.uk](http://www.carlisle-diocese.org.uk). This Policy was last updated in April 2018.

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**Data Controllers** – contact details for the Data Controllers are as follows:

Carlisle Diocese Board of Finance:  
Church House, 19-24 Friargate, Penrith CA11 7XR  
Tel: 01768 807777

Cumbria Christian Learning  
Church House: 19-24 Friargate, Penrith CA11 7XR  
Tel: 01768 807777