1. Your Privacy

*At Sheldon Community Church, we are committed to maintaining the trust and confidence of visitors to our website. We also take protecting data very seriously and have put systems, processes and procedures in place to keep your private information safe and secure.*

*In this Privacy Policy, we’ve provided lots of detailed information on when and why we might collect your personal information, how we use it and how we keep it secure.*

1.1. What is the purpose of this Privacy Policy?

This Privacy Policy is provided to you by Sheldon Community Church (SCC), who uses personal information for general church administration and communication purposes. SCC recognises the importance of the correct, lawful and ethical treatment of personal information. All personal information, whether it is held on paper, on computer or other media, will be subject to the appropriate legal safeguards as specified in the General Data Protection Regulation (GDPR). To view our full privacy policy, please see *Section 8*.

SCC is a “data controller” which means we have to tell you certain things when processing your personal information. We may input personal information into our Church Database systems or may ask you to do so yourself. We may collect information from you in person or we may ask you to fill in paper forms or input information into other systems that the church uses.

If you have any queries about this Privacy Policy or how we use your personal information, please contact our Data Protection Lead, using the details in our “*Contact Us*” section below.

This Privacy Policy relates to your use of our Services and tells you:

* What personal information we collect about you, and how we collect it *(see Section 2)*
* How we use your personal information *(see Section 3)*
* Who we may share your personal information with *(see Section 4)*
* How we keep and protect your personal information, how long for, and any transfer outside of the EEA *(see Section 5)*
* What rights you have in relation to your personal information *(see Section 6)*
* How to contact us *(see Section 7)*
* Details of our full and current Privacy Policy *(see Section 8)*

1.2. Our Database and Systems

SCC uses systems held on secure servers to help us administer our church and provide all elements of pastoral care, communication and support to our members and the community. Our members may be provided with access to various Services, which they can use to provide us with information (including personal information), update preferences and access options to allow the booking of events and recording attendance.

2. Personal Information we process about you

2.1. What information we process about you

We may collect the following information about you, including **contact details, demographic information** (*e.g. age, marital status*), **financial information** (*when making donations*), **attendance information** (*to help with planning and coordination*), **church roles** (*teams, groups*), **safeguarding information** (*to carry out a DBS check, and record the result*), **rota information** (*when serving on teams*), **pastoral care information, audit information** (*recorded when using our Services*), **photographs and videos.**

2.2. Sensitive Personal Information

We may also collect, store and use “special categories” of sensitive personal information (if you give us this information – *Section 3* explains our legal basis for processing such information, and how we use it).  These include **your health** (*including any mental or physical conditions that you notify us about*), **religious beliefs, racial origin, sexual orientation** or **any criminal record.**

2.3. Personal Information you give us

We collect personal information from you, when you:

* Fill in one of our paper forms, or a form available in a different electronic system, including our website
* Attend church and speak to us in person
* Sign up to an SCC event or course
* Join a church serving team (*rota*) or ministry (*for example Hope Community Shop, Excel, JaM, a Life Group*)
* Or make a financial donation to the church, typically through the Gift Aid scheme.

2.4. Personal Information we collect automatically

When you use our Services, we may collect certain information automatically such as your **IP addresses** (*the name your computing device uses to identify itself to us*), **your activity in the Services** (*including times and dates of visits*), and **information on your location.**

2.5. Cookies

We may use cookies to collect information automatically. A cookie is a small file of data which our website places on your computer’s hard drive to give us standard internet log information, such as details of your visits to our website. They allow websites to respond to you individually and tailor your visit by gathering and remembering information about you, providing a better experience.

For further information visit [www.aboutcookies.org](http://www.aboutcookies.org/) or [www.allaboutcookies.org](http://www.allaboutcookies.org/).

3. How we use your Personal Information

3.1. Our legal basis for using your information

The law only allows us to use your personal information in certain limited circumstances. We have listed these below and what information they allow us to process.

1. Where it is necessary for our legitimate interests.

Under GDPR, it is for our legitimate interests as a church, to process information relating to its members for the purpose of administering your membership of the church

1. Where you have consented to us using your personal information
2. Where we need to perform the contract we have entered into with you
3. Where we need to comply with a legal obligation

3.2. How we use Sensitive Personal Information

“Special categories” of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

1. In limited circumstances, with your explicit consent recorded in writing (*e.g. where you tell us information to obtain support and pastoral care from us – for example, this could relate to physical or mental health*)
2. Where we need to carry out our legal obligations (*e.g. ensure DBS checking is undertaken where appropriate*)
3. Where it is needed in the public interest and in line with our data protection policy
4. Where it is needed in connection with our safeguarding policy (to protect children and vulnerable adults).

Less commonly, we may process this type of information where it is needed to protect your (or someone else’s) interests, and you are not capable of giving your consent, or where you have already made the information public.

3.3. What this means in practice

We may use your sensitive personal information in the following ways:

* your mental or physical health, racial origin, sexual orientation or criminal record in order to provide you with support and pastoral care. We may also use this information to help you access support and benefits if appropriate and requested by you
* your religious beliefs in order to administer your membership of our church
* your DBS check (which may contain information relating to criminal offences or presence on a register) to decide your suitability for roles in the church.

In all cases where we require consent, we will seek your written consent or record your consent in writing to allow us to process certain sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

3.4. Information about Children

Whilst information relating to children is not considered to be special category information, it is information that is given specific protection. Where the child is under the age of 13, we will always ask for the consent of parents/carers before allowing the child to use any of our Services.

Where a child is 13 or over, then we will permit the child to access our Services, but we may (if we believe it to be appropriate in the circumstances) inform their parents/carers. We will tell the child at the time of signing up that we may inform their parents/carers and we will only do this where it is appropriate and lawful to do so.

4. Sharing your Personal Information

Please remember:

* **We will NOT sell or rent your information to third parties**
* **We will NOT share your information with third parties for marketing purposes**

4.1. Other third parties

For details of the third parties with whom we may share your details with, please refer to our full privacy policy.

4.2. Third Party Privacy Policies

Services may contain links to websites owned by other organisations.  If you follow a link to another website, these websites will have their own privacy policies.  We suggest that you check the policies of any other websites before giving them your personal information as we cannot accept responsibility for any other website.

5. Keeping your Personal Information

5.1. How we store your personal information

The security of your personal information is very important to us. We use appropriate technical and organisational measures to safeguard personal information, and encryption technology where appropriate to enhance privacy and help prevent information security breaches.

Any personal information that we provide to you will be normally be held within the EEA. If data was ever transferred outside of the EEA, your information will only be placed on systems that gave equivalent protection of your rights, through international agreements approved by the European Union.

All third parties who provide Services to us are required to sign a contract requiring them to have appropriate technical, administrative and physical procedures in place to ensure that your information is protected against loss or misuse. We will never pass your information to third parties for commercial purposes (*e.g. for marketing*), unless you have requested us to do so, or we are required to do so by law - for example, by a court order or for the purposes of prevention of fraud or other crime.

All information you provide to us is stored on our secure servers or on secure servers operated by a third party.

5.2. Retention of information

We only hold your personal information for as long as necessary for the purposes for which we collected your information. In practice, we will:

* Delete personal information/records if you ask us to;
* Maintain regular monitoring of databases and where individuals are known to have left the church, seek confirmation of such, archive and then remove such individuals from the database;
* Undertake a deep cleanse of the database, approximately every two years.

We will keep some records permanently if we are legally required to do so. We may also 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 6 years to support HMRC audits. In general, SCC will endeavour to keep information only for as long as we need it, after which time, it will be deleted.

5.3. Emails

If you choose to send us information via email, we cannot guarantee the security of this information until it is delivered to us. Also, we cannot guarantee the security of any information sent to other volunteers who use third party email providers such as Gmail accounts.

5.4. Google Hangouts and WhatsApp Groups

We use 3rd party messaging systems such as Google “Hangouts” and “WhatsApp” for group and team based communication. If you want to join such a group, then you can only do so once you have given us your consent verbally or electronically, as other people in the group will see your name, telephone number, email and picture. WhatsApp uses end-to-end encryption to keep your messages secure. Read Google’s [Privacy Policy](https://policies.google.com/privacy?hl=en-GB&gl=uk) for further information.

6. Your rights

Under GDPR, you have several rights, including a right to access your information. For details of these rights, please see our full privacy policy. To exercise any of your rights, please email/write to us using the contact details listed below.

7. Contact Us

We welcome questions, comments and requests regarding this Privacy Policy or the information we hold about you. You may also contact us to exercise all relevant rights, queries or complaints:

Email - Data Controller

Address - Sheldon Community Church 189 Whitecroft Road Sheldon Birmingham B26 3RL

Tel - 0121 743 5533

You can also contact the Information Commissioner’s Office:

Email - [www.ico.org.uk/global/contact-us/email](http://www.ico.org.uk/global/contact-us/email)

Address - Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF.

Tel - 0303 123 1113

8. Full Privacy Policy

Please read the document below for our full and current Privacy Policy:

9. Changes to this Privacy Policy

We reserve the right to make any changes and updates to our Privacy Policy as and when we need to without giving you notice. We will always make sure that the most up to date Privacy Policy is posted on our website.

25th May 2018