

Proclaimers Data Protection Policy

Proclaimers uses personal data about living individuals for the purpose of general church administration and communication.

We recognise the importance of the correct and lawful treatment of personal data. All personal data, whether it is held on paper, on computer or other media, will be subject to the appropriate legal safeguards as specified in the Data Protection Act 1998.

Proclaimers fully endorses and adheres to the eight principles of the Data Protection Act. These principles specify the legal conditions that must be satisfied in relation to obtaining, handling, processing, transportation and storage of personal data. Employees and any others who obtain, handle, process, transport and store personal data for Proclaimers must adhere to these principles.

The Principals are:

1. Personal data shall be processed fairly and lawfully and, in particular, shall not be processed unless –
 - (a) at least one of the conditions in Schedule 2 is met, and
 - (b) in the case of sensitive personal data, at least one of the conditions in Schedule 3 is also met.
2. Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes.
3. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
4. Personal data shall be accurate and, where necessary, kept up to date.
5. Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
6. Personal data shall be processed in accordance with the rights of data subjects under this Act.
7. Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
8. Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

Collection of Data and the Use of Personal Data

- We are committed to being open and honest with people when it comes to what we do with their data. As a result we will have a privacy policy available on our website to download. We will also make people aware of this policy at the point of completing one of our church welcome cards.
- When you visit, or register for services on our site the Church will collect general information about you, such as your name, address, contact details so the Church can contact you. We may also collect this and other types of personal information during the course of dealing with you, for example credit or debit card information when you wish to obtain goods or services from the Church, when you register for conferences or events, and when you participate in Church activities or complete other forms. We may also collect information about your usage of our website as well as information about you from e-mails or letters you send to us.
- The Church will use the personal information we collect for the purpose disclosed at the time of collection, or otherwise as set out in this Privacy Policy. We will not use your personal information for any other purpose without first seeking your consent, unless authorised or required by law. Generally we will only use and disclose your personal information as follows:
 - (a) to establish and maintain your involvement with the Church, including providing you with regular correspondence;
 - (b) to provide the products or services you have requested from the Church;
 - (c) to answer your enquiry by post, telephone, fax as well as email;
 - (d) to register you for events, conferences or promotions;
 - (e) to assist us to make the Church's sites, services and products more valuable to our community;
 - (f) for direct promotion of products or services and to keep you informed of new developments we believe may be of interest to you. If we contact you in this way without obtaining your prior consent, we will provide you with the opportunity to decline any further promotional communications;
 - (g) to third parties where we have retained those third parties to assist us to operate the Church and provide the products or services you have requested, such as religious education instructors, catering and event coordinators, promotions companies, transport providers, health care providers, website hosts and IT consultants, and our professional advisers such as consultants, lawyers and accountants. In some circumstances we may need to disclose sensitive information about you to third parties as part of the services you have requested; and
 - (h) to different parts of the Church to enable the development and promotion of other products and services and to improve our general ability to assist Church attendees and the wider community.

- The information you provide to us will be held on computers in the EU but from time to time, may be accessed by or given to our staff and associated churches working outside the UK and third parties some of who are located outside the European Economic Area who act for us for the purposes set out in this policy or for other purposes approved by you. Those parties process information, fulfil and deliver orders, process credit card payments and provide support services on our behalf. We may also pass aggregate information on the usage of our site to third parties but this will not include information that can be used to identify you.
- Where you have consented when providing us with your details, we may also allow carefully selected third parties, including other churches in our group, to contact you occasionally about products and services which may be of interest to you. They may contact you by post, telephone or fax, as well as by e-mail. If you change your mind about being contacted by these organisations in the future, please contact us.
- Countries outside the European Economic Area do not always have strong data protection laws. However, we will always take steps to ensure that third parties use your information in accordance with this policy.
- Unless required to do so by law, we will not otherwise share, sell or distribute any of the information you provide to us without your consent.

Security

- Staff and volunteers are encouraged to ensure they comply with our minimum requirements for password complexity. The use of strong password protection is included as part of their data protection training. This includes using passwords with upper and lower case letters and numbers/symbols. It is advised to change passwords at regular intervals.
- All portable devices that contain personal information, such as laptops, tablets and computers, are encrypted. This includes those personally owned devices which have information of a confidential or personal nature.
- We will only keep individuals information for as long as is necessary. The systems we use such as 'mailchimp', make it easy and clear for people to unsubscribe from our email database which then also removes them from our master database on Churchapp.
- To prevent the retention of excessive, irrelevant or out of date information, a formal retention and disposal schedule of peoples personal information is in place. This includes weeding of personal data held within manual records as follows:

1. ChurchApp

- Financial information such as historical gift aid declarations are destroyed at regular intervals.
- Any physical data containing personal information such as gift aid declarations, accident/incident reports and other paperwork is kept in a secure, lockable cabinet.
- At Proclaimers we operate a clear desk policy. This means that at the end of a working day staff are required to clear their desks of all paperwork, folders or portable media devices that may contain confidential information or information of a personal nature.
- When working remotely from home staff and volunteers with access to information of a personal, confidential or sensitive nature are required to do the following:
 1. Ensure all equipment has strong password protection in place. This includes any of your own private computers, memory sticks and mobile devices that may contain information of a personal, confidential or sensitive nature.
 2. Do not allow your personal IT equipment to 'remember password' for any of our databases
 3. Do not leave your IT equipment logged in unattended
 4. Avoid at all costs taking any written documentation home which may contain information of a personal, confidential or sensitive nature
 5. If you absolutely must take home written documents containing information of a personal, confidential or sensitive nature, this must be kept secure in a locked cupboard/cabinet when in your home, must not be left unattended, must not be left in your car.

Databases

- Access to our database systems is assessed on a need to know basis. All staff and volunteers will be required to complete data protection training and to sign one of our confidentiality agreements in accordance with their access to the following database systems we use:
 1. ChurchApp – those who have access to telephone numbers, date of birth information, home addresses
- This training will include how they should store and handle personal information.
- Refresher training will be provided every year.

- Monthly monitoring of access to databases is to ensure that those no longer requiring access are removed as quickly as possible.

Photographs

- Photographs taken at church events or within the church building will be used solely for the purpose of Proclaimers advertising, marketing and public relations which may include internal and or external materials, website, social media, print or other publicity material.
- As part of our child protection policy we ask for consent from parents/guardians in relation to photographs of those under the age of 18.