

# Struthers

## MEMORIAL CHURCH

### Privacy Notice

#### **Your personal data – what is it?**

“Personal data” is any information about a living individual which allows them to be identified from that data (for example a name, photographs, videos, email address, or address). Identification can be by the information alone or in conjunction with any other information. The processing of personal data is governed by the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and other legislation relating to personal data and rights such as the Human Rights Act [1998].

#### **Who are we?**

Struthers Memorial Church (SMC) is a company limited by guarantee incorporated in Scotland. It is also a registered Scottish Charity No. SC006960. Struthers Memorial Church’s headquarters is in Greenock, Scotland where the work started, and we now have 9 churches throughout Britain. SMC employs several paid staff and relies greatly on the help and availability of many volunteers. A wide range of manual, administrative and professional skills are required to assist with the running of the organisation and many members of the various churches enthusiastically provide such help.

In addition, SMC runs the New Dawn Bookshop and Coffeeshop and Cedars School, which are all based in Scotland. Cedars School is an independent Christian School in Greenock catering for children from 5 to 18 years.

Struthers Memorial Church is the data controller for your data. For this privacy notice, each church, Bookshop and Cedars School will be referred to as a ‘branch’. Each branch is made up of several different role-holders who work together to deliver the Church’s mission. They work together with:

- The Minister of each branch, where relevant.
- The Treasurer of each branch, where relevant.
- The employees and volunteers of each branch; and
- the Board of Directors of Struthers Memorial Church.

As the Church is made up of all these persons and branches working together, SMC may need to share personal data we hold with them so that they can carry out their responsibilities to SMC and the community. This means we are all responsible to you for how we process your data. Role-holders from each branch are required to follow SMC’s data protection policies and procedures. This means we are all responsible to you for how we process your data. Each of the branches has their own tasks within the organisation and a description of what data is processed, and for what purpose is set out in this Privacy Notice. This Privacy Notice is sent to you on behalf of SMC and on behalf of each of its branches. In the rest of this Privacy Notice, we use the word “we” to refer to each branch, as appropriate.

#### **How do we process your personal data?**

SMC will comply with its legal obligations to keep personal data up to date; to store and destroy it securely; to not collect or retain excessive amounts of data; to keep personal data secure, and to protect personal data from loss, misuse, unauthorised access and disclosure and to ensure that appropriate technical measures are in place to protect personal data.

# Struthers

## MEMORIAL CHURCH

We use your personal data for some or all the following purposes:

- To enable us to meet all legal and statutory obligations.
- To minister to you and to provide pastoral care duties to members of the congregation (such as visiting you when you are ill) and to organise and perform church services for you, such as water baptisms, weddings, and funerals.
- To carry out comprehensive safeguarding procedures in accordance with best safeguarding practice with the aim of ensuring that all children and vulnerable adults are provided with safe environments.
- To deliver the Church's mission to our community, and to carry out any other voluntary or charitable activities for the benefit of the public as provided for in our constitution and statutory framework.
- To administer the church databases.
- To process a donation that you have made (including Gift Aid information).
- To fundraise and promote the interests of the church and charity.
- To seek your views or comments.
- To manage our employees and volunteers.
- To maintain our own accounts and records.
- To send you communications which you have requested and that may be of interest to you. To keep you informed about events, activities and services at Struthers Memorial Church.
- To process an application for a role.
- To enable us to provide a voluntary service for the benefit of the public.
- We will process data about role holders for legal, personnel, administrative and management purposes and to enable us to meet our legal obligations, for example to pay role-holders, monitor their performance and to confer benefits in connection with their engagement as a role holder. Role holders include volunteers, employees, contractors, agents, staff, retirees, temporary employees, beneficiaries, treasurers and other role holders.
- Our processing also includes the use of CCTV (Bookshop/Coffeeshop only) systems for the prevention and prosecution of crime.

### **What personal data do we process?**

- Names, titles, and aliases.
- Contact details such as telephone numbers, addresses, and email addresses.
- Where relevant to our mission, we may process demographic information such as gender, age, date of birth, marital status, nationality, education/work histories, academic/professional qualifications, employment details, hobbies, family composition, and dependants.
- Non-financial identifiers such as passport numbers, driving license numbers, vehicle registration numbers, taxpayer identification numbers, employee identification numbers, tax reference codes, and national insurance numbers.
- Financial identifiers such as bank account numbers, payment card numbers, payment/transaction identifiers, policy numbers, and claim numbers.
- Financial information such as salary, bonus, record of earnings, tax code, tax and benefits contributions, expenses claimed, car allowance (if applicable), or where you make donations or pay for activities such as use of a church hall.
- Other operational personal data created, obtained, or otherwise processed while carrying out our activities, including but not limited to, CCTV footage, IP addresses and website visit histories, logs of visitors, and logs of accidents, injuries and insurance claims.

# Struthers

## MEMORIAL CHURCH

- 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. Where you provide this information, we may also process other categories of sensitive personal data: racial or ethnic origin, mental and physical health, details of injuries, medication/treatment received, biometric data and criminal records, fines and other similar judicial records.

### **What lawful bases do we use for processing your personal data?**

The lawful bases for processing personal data are set out in Article 6 of the UK GDPR. At least one of these must apply whenever we process your personal data:

**(a) Consent:** the individual has given clear consent for you to process their personal data for a specific purpose.

**(b) Contract:** the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.

**(c) Legal obligation:** the processing is necessary for you to comply with the law (not including contractual obligations).

**(d) Vital interests:** the processing is necessary to protect someone's life.

**(e) Public task:** the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.

**(f) Legitimate interests:** 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.

We will process your person data to assist in fulfilling our obligations to members of the congregation and visitor to the church including pastoral and administrative support; we will always consider your interests, rights and freedoms. Most of the personal data we processed is necessary for our legitimate interests, or the legitimate interests of a third party in accordance with the UK GDPR Article 6(1)(f). To comply with our obligations, we will need to process information relating our events and activities, e.g., church services, Sunday School, outreaches, conferences.

Some processing is necessary for compliance with a legal obligation in accordance with Article 6(1)(c). For example, we are required to provide person data when holding conferences, or to manage the Gift Aid scheme. We may also process personal data if it is necessary for the performance of a contract with you or to take steps to enter a contract in accordance with Article 6(1)(c). An example of this would be processing your data in connection with the hire of halls or equipment, travel and transport arrangements, etc.

We may also process data with your explicit consent in accordance with the Article 6(1)(a) so that we can keep you informed about news, events, activities and services. Religious organisations are also permitted to process information about your religious beliefs to administer membership or contact details.

# Struthers

## MEMORIAL CHURCH

### Sharing your personal data

Your privacy is important to us, and your personal data will be treated as strictly confidential. It will only be shared with third parties including other data controllers where it is necessary for the performance of SMC's tasks or where you give us your prior consent. It is likely that we will need to share your data with

- The appropriate bodies including the other branches.
- Our agents, role holders and contractors.
- Other laypersons nominated by SMC to support the mission of the organisation in the community. For example, assistants who may provide confidential mentoring and pastoral support or support our ministers. Assistant or temporary ministers may participate in our mission in support of our ministers.
- Other persons or organisations, where relevant, to enable us to meet our legal obligations.

### How long do we keep your personal 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. 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.

### Your rights regarding your personal data

The UK General Data Protection Regulation gives you several rights regarding your personal information. You will not always be able to exercise all the rights set out in the UK GDPR as they vary depending on why we collected the personal data. There are also some circumstances where your rights cannot be exercised because exemptions will apply. We will explain this in our response to you.

The UK GDPR provides the following rights for individuals:

1. The right to be informed (Article 13 and 14)

You have the right to be informed about the collection and use of your personal data. The right to be informed covers some of the key transparency requirements of the UK GDPR.

When we collect personal data from the you, we must provide you with privacy information at the time we obtain your data; this privacy notice seeks to explain simply and clearly how and why we intend to process your data.

2. The right to access (Article 15)

You have the right to access your personal data, commonly referred to as subject access. Individuals can make a subject access request verbally or in writing. We have one month to respond to a request and cannot charge a fee to deal with a request in most circumstances.

Where we are legally permitted to do so, we may refuse your request. If we refuse your request, we will tell you the reasons why.

3. The right to rectification (Article 16)

If you believe that any data that we hold about you is out of date, incomplete or incorrect, you have a right to request that we restrict the processing of that information and to rectify the inaccurate personal information - although this may depend on the purposes for the processing. This right has close links to the accuracy principle of the UK GDPR Article 5 (1)(d).

#### 4. The right to erasure (Article 17)

You have the right to have personal data erased. This is also known as the 'right to be forgotten'. The right only applies to data held at the time the request is received. It does not apply to data that may be created in the future. The right is not absolute and only applies in certain circumstances.

You may request that we delete your personal information if you believe that:

- We no longer need to process your information for the purposes for which it was provided.
- We have requested your permission to process your personal information and you wish to withdraw your consent; or
- we are not using your information in a lawful manner.

#### 5. The right to restrict processing (Article 18)

You have a limited right of restriction of processing of your personal data. Where processing of your data is restricted, we can be stored your personal data, but most other processing actions, such as deletion, will require your permission.

This is an alternative to requesting the erasure of their data. Individuals have the right to restrict the processing of their personal data where they have a particular reason for wanting the restriction.

#### 6. The right to data portability (Article 20)

Where we have requested your permission to process your personal information, you have a right to receive the personal information you provided to us in a portable format.

You may also request to provide it directly to a third party, if technically feasible. We're not responsible for any such third party's use of your information, which will be governed by their agreement with you and any privacy statement they provide to you. We will comply with your request, where it is feasible to do so, within one month of receiving your request.

Please note that this right only applies to data that is being processed electronically.

#### 7. The right to object (Article 21)

You have the right to request that we stop processing your data. You must tell us your circumstances justifying your objection to processing. Please be aware that we can still process personal information where there are compelling grounds, or it is necessary for legal reasons.

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.

#### 8. The right not to be subject to automated decision-making including profiling (Article 22)

You have the right to not be subject to a decision based solely on automated processing. Processing is "automated" where it is carried out without human intervention and where it produces legal effects or significantly affects you.

When exercising any of the rights listed above, 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.

#### **Transfer of Data Abroad**

Any electronic personal data transferred to countries or territories outside the UK will only be placed on

# Struthers

## MEMORIAL CHURCH

systems complying with measures giving equivalent protection of personal rights either through international agreements or contracts that comply with UK data protection legislation. Our website is also accessible from overseas so on occasion some personal data may be accessed from overseas.

### **Further processing**

If we wish to use your personal data for a new purpose, not covered by this Privacy Notice, then we will provide you with an updated privacy 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 this notice**

We keep this Privacy Notice under regular review and is subject to change at any time. This Privacy Notice was last updated in June 2023.

### **Contact Details**

To make enquiries about this Privacy Notice, to exercise any of your rights set out above, or to withdraw your consent to the processing of your Data (where consent is our legal basis for processing your Data), please contact us at:

Data Protection Team  
Struthers Memorial Church  
33 West Stewart Street  
Greenock  
PA15 1SH

Email: [data.protection@struthers-church.org](mailto:data.protection@struthers-church.org)  
Phone: 01475 729668

You can contact the Information Commissioner's Office on 0303 123 1113 or at the:

Information Commissioner's Office,  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

or visit [www.ico.org.uk](http://www.ico.org.uk).