

Malmesbury & Upper Avon Benefice is committed to delivering our obligations under the General Data Protection Regulation (GDPR)¹ in the way we process, collect, record, store and dispose of personal data. This Data Privacy Notice explains what we do in relation to personal data, how to find out more and who to contact to exercise your GDPR rights.

Personal Data is information relating to an identifiable living individual. Whenever personal data is processed, collected, recorded, stored or disposed of it must be done within the terms of the GDPR.

The Malmesbury Abbey with Brokenborough and Corston & Rodbourne Parochial Church Councils (PCCs) act together as **Data Controller** (under the terms of GDPR), deciding how any personal data held by Malmesbury & Upper Avon Benefice is processed, collected, recorded, stored and disposed of.

Our GDPR obligations. We comply with our obligations under GDPR by keeping personal data up-to-date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

Use of personal data. We use personal data to:

- enable us to provide a voluntary service for the benefit of the public as defined in our charitable objects of “promoting in the ecclesiastical parish the whole mission of the church”.
- inform people of news, events, activities and services in the benefice and wider church.
- administer membership records.
- manage our employees and volunteers.
- maintain our own accounts and records (including the processing of Gift Aid applications).
- fundraise and promote the interests of the church.

Legal basis for processing personal data. Under GDPR, our bases for processing personal data are:

- **Explicit consent.** Explicit consent from data subjects so that we can keep them informed about news, services, events and activities in the parish and wider church community, and to process Gift Aid donations.
- **Legal obligation.** Where processing is necessary for carrying out our obligations under employment, social security or social protection law, or a collective agreement;
- **As a religious not-for-profit body with a religious aim,** we may process personal data provided:

¹ General Data Protection Regulation effective 25 May 2018. For more information visit www.ico.org.uk and www.parishresources.org.uk/gdpr

- it relates only to members or former members (or those who have regular contact with the Abbey, Brokenborough, Corston or Rodbourne churches in connection with those purposes) and
- there is no disclosure to a third party without consent.

Sharing personal data. We treat all personal data as strictly confidential and it will only be shared with other members of the church in order to carry out a service to other church members or for purposes connected with the church. We will only share your data with third parties with your consent.

How long do we keep your personal data? We retain data in accordance with current Church of England guidance² which dictates retention periods for, and final disposal of, parish records. Specifically, we retain Electoral Roll data while it is still current; Gift Aid declarations and associated paperwork for up to 6 years after the calendar year to which they relate; and Parish Registers (Baptisms, Marriages, Funerals) permanently.

Your rights and your personal data. Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- to request a copy of your personal data which we hold.
- to request that we correct your personal data if it is found to be inaccurate or out-of-date.
- to request your personal data is erased where it is no longer necessary for us to retain such data.
- to withdraw your consent to the processing of your personal data at any time.
- to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller (known as the ‘right to data portability’).
- where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing.
- to object to the processing of personal data.
- to lodge a complaint with the **Information Commissioner’s Office**.

Further Processing. If we wish to use your personal data for a new purpose, not covered by this Data Privacy Notice, we will provide you with a new 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.

Contact Details

- **Enquiries & GDPR Requests.** For enquiries or to exercise rights under GDPR, in the first instance please contact the Parish Administrator **T:** 01666 826666 **e:** office@malmesburyabbey.com **a:** Parish Administrator, Abbey Office, Old Squash Court, Holloway, MALMESBURY SN16 9BA
- **Information Commissioner’s Office** You can contact the Information Commissioners Office **T:** 0303 123 1113 **e:** <https://ico.org.uk/global/contact-us/email/> **a:** Information Commissioner's Office, Wycliffe House, Water Lane, WILMSLOW, Cheshire SK9 5AF

² ‘Keep or Bin...? The Care of Your Parish Records’ Church of England Record Centre Records Management Guide No. 1 Revised 2009 www.churchofengland.org/more/libraries-and-archives/records-management-guides