

DATA PRIVACY NOTICE

The Cathedral Council of Holy Trinity Gibraltar

Introduction

This policy is for Holy Trinity Cathedral, Gibraltar. The purpose of this policy is to explain to you how we control, process, handle and protect your personal information when you engage with our community in person or online.

1. Your personal data – what is it?

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession. The processing of personal data is governed by the General Data Protection Regulation (GDPR) in force in Gibraltar.

2. How do we process your personal data?

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
- by ensuring that appropriate technical measures are in place to protect personal data.

We use your personal data for the following purposes: -

- To enable us to provide a voluntary service for the benefit of the cathedral;
- To administer membership records;
- To fundraise and promote the interests of the cathedral;
- To manage our employees and volunteers;
- To maintain our own accounts and records (including the processing of gift aid applications);
- To inform you of our news, events, activities and services;
- To share your contact details with the Diocesan offices so they can keep you informed about news in the diocese and events, activities and services that will be occurring in the diocese and in which you may be interested.
- To respond to emails sent via our website.

4. What is the legal basis for processing your personal data?

- Explicit consent of the data subject so that we can keep you informed about news, events, activities and services and process your gift aid donations, keep you informed about diocesan events and respond to email queries.
- Processing is at times necessary for carrying out obligations under employment, social security or social protection law, or a collective agreement;
- Processing is carried out by a not-for-profit body with a religious aim provided: -
 - the processing relates only to members or former members (or those who have regular contact with it in connection with those purposes); and
 - there is no disclosure to a third party without consent.

5. Sharing your personal data

Your personal data will be treated as strictly confidential and will only be shared with other members of the cathedral in order to carry out a service to other members or for purposes connected with the church. We will only share your data with third parties outside of the parish with your consent.

6. How long do we keep your personal data¹?

We keep data in accordance with the guidance set out in the guide “Keep or Bin: Care of Your Parish Records” which is available from the Church of England website [see footnote for link].

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; parish registers (baptisms, marriages, funerals) permanently and email records as long as they are necessary for us to respond to email requests.

7. Email and internet policy.

Internet cookies

We do not use cookies on our website.

Emails

We use contact forms on our website to allow you to contact members of our ministry team and other church officers. Your personal details will only be used by the person you contact to allow us to respond to you. They will be shared with other members of the cathedral only if necessary, and only with your express permission. Your details will never be added to any mailing lists.

You are able to sign up to mailing lists from our website or by completing a card available in the cathedral. We use MailChimp as our automated email provider and your information is handled by them in accordance with their privacy policy which you can read here:

<https://mailchimp.com/legal/privacy/>

We will only use the list to send updates and news from the cathedral and we will never pass the list onto anyone else. We do not send any marketing emails of any kind.

8. 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: -

- The right to request a copy of your personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary for us to retain such data;
- The right to withdraw your consent to the processing at any time
- The right, 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;
- The right to object to the processing of personal data.

¹ Details about retention periods can currently be found in the Record Management Guides located on the Church of England website at: - https://www.churchofengland.org/sites/default/files/2017-11/care_of_parity_records_keep_or_bin_-_2009_edition.pdf

9. Storage and further processing

Paper records are kept under lock and key. Computer data is password protected, whether on a local computer or in the cloud.

If we wish to use your personal data for a new purpose, not covered by this Data Protection Notice, then 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.

10. CCTV and service streaming

For the purposes of safety and security our premises are covered by Closed Circuit Television; images (but not sounds) are recorded. Recordings are automatically deleted after about four weeks, as the machine makes space for new material.

Our main Sunday service, and some occasional services are *streamed* on YouTube (both images and sounds), and are *recorded* both locally and on YouTube servers. This is so that people unable to attend are able to benefit from our services. Notices at the church entrances advise the public that this streaming takes place. Our website explicitly mentions the possibility of viewing recordings.

11. Contact Details

To exercise all relevant rights, queries or complaints please in the first instance contact the Dean at dean.gib@europe.anglican.org

Information about data protection in Gibraltar can be found here:
<https://www.gra.gi/data-protection/general-data-protection-regulation>

Agreed by the Cathedral Council on 18th November 2021