

# DATA PROTECTION PRIVACY STATEMENT

## Our Commitment to Privacy

Trinity Road Chapel is committed to protecting personal data as a top priority. When dealing with any personal information we as a church will observe our obligations with regards to protecting personal data.

Types of personal information the trustees will collect include:

- a) Contact details, including name, date of birth, address, telephone numbers, email address, etc.
- b) In some cases, e.g. if you regularly make purchases for the church and require reimbursement, we will store your bank account details, but only on the bank's secure website.

It is not normally the trustee's policy to ask for or store any sensitive information. This includes, but is not limited to, the following types of information:

- a) health information – unless it is necessary as part of an employee's ongoing contract,
- b) information such as attendance at meetings, etc., unless we are required by law to do so,
- c) personal credit card data; and
- d) any idiosyncratic or personal information that is obtained from an individual or from a third party.

The information that the trustees collect is only used:

- a) as a means of communication between the church leaders and church members,
- b) to allow church members to communicate amongst themselves, or
- c) to allow the church to reclaim finance in the form of Gift Aid.

The trustees do not use the information in any way other than in the furtherance of the objectives and purposes of Trinity Road Chapel.

The trustees will only use the information that an individual has provided:

- a) for the immediate reason for which it was provided;
- b) to maintain contact with the data subject when there are matters to be shared, e.g. urgent prayer requests, forthcoming events, etc., or
- c) for any other purpose directly related to the work of Trinity Road Chapel and for which the data provided has given their consent (where it is reasonably required by law).

The trustees will not sell or exchange any of the data subject's information under any circumstances unless it may be legally required, e.g. by a Government Department.

The trustees will only collect information from an individual directly. No information will be collected from third party sources.

Personal information may be collected:

- a) by face to face contact,
- b) electronically, via social media messaging, or
- c) during phone calls.

The trustees will only allow the use of an individual's personal and sensitive information for the purpose(s) which were stated when the information was collected, or as otherwise permitted by law. The trustees will not disclose any information that was collected from third party sources.

Unless a Data Subject is subject to an exemption under relevant legislation, they have the certain "*Rights*" in respect of their personal data. These rights are:

1. The right to request a copy of the personal data held,
2. The right to request correction of any personal data that is inaccurate, incomplete, or out of date,
3. The right to request erasure of personal data a) where it is no longer necessary for the trustees to continue processing it, b) where the Data Subject has successfully exercised their right to object to the data being processed, c) where the data has been processed unlawfully, or d) where the law otherwise requires the data to be erased.

4. The right to object to processing of personal data where the data subject considers that their personal rights and freedoms override Trinity Road Chapel's legitimate interest;
5. The right to request restriction of processing where the data subject has disputed the accuracy of the data or the lawfulness of the processing, or where the Data Subject wishes the trustees to retain data that would otherwise be deleted.

Occasionally, the trustees may need to refuse a request to access information for example, where granting access would infringe someone else's privacy. The trustees will aim to respond to any request within 28 days of receiving the request. If the trustees are unable to help with the request, a written explanation will be provided as to the reason why.

It is the policy of the trustees of Trinity Road Chapel to:

- a) permanently de-identify personal information where reasonable and possible; and
- b) destroy personal information once there is no longer a legitimate need for the trustees of Trinity Road Chapel to retain it.

Certain information may be retained on the records of Trinity Road Chapel for historical purposes for future years.

The trustees respect the right of a data subject to be dealt with anonymously, provided that is it lawful and practicable.

Whenever possible, the trustees will try to accommodate a request for anonymity. It should be noted, however, that in some circumstances, this may prevent the trustees from practically and effectively communicating with an individual. If this is the case the trustees will notify the individual concerned.

Part of the legal responsibilities of the trustees as an employee may, on some occasions, require the them to collect health information on any of its employees. Prior to proceeding with any request to collect any form of health information about an employee, the trustees will explain how the information will be used and to whom it will be disclosed. They will also obtain the employee's written permission to proceed.

If health information is collected from a third party, such as from a doctor, the employee will be informed that this information has been collected and will explain how this information will be used and disclosed.

The trustees will not use health information beyond the extent of the consent provided by the employee, unless further consent has been obtained or in accordance with one of the exceptions under the Privacy Act or in accordance with another applicable law.

If an individual has any questions about this privacy policy, is concerned about how the personal information has been collected or is being managed, or wishes to access their personal information, the following procedure should be adopted.

- a) In the first instance the individual should speak personally to any of the trustees.
- b) If the personal approach does not prove to be satisfactory, then the individual may contact Trinity Road Chapel in writing at 205 Trinity Road, Tooting, London. SW17 7HW, marking it for the attention of the Data Protection Manager, or by email at [dataprotection@trinityroadchapel.org](mailto:dataprotection@trinityroadchapel.org) to request a Complaints Form.
  - 1) The Complaints Form should, when completed, be returned to one of the trustees.
  - 2) In order to effectively address an individual's complaint, the trustees may request further information regarding the complaint and the reasons behind it.
  - 3) If an individual is not satisfied with how the trustees have handled a complaint, the individual is then at liberty to lodge a complaint with the Information Commissioner's Office on 0303 123 1113; by email at <https://ico.org.uk/global/contact-us/email/> or in writing to the *Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.*

The trustees may amend the Privacy Policy from time to time if it becomes necessary to keep the policy in line with current legislation. A copy of the amended version will be made available at Trinity Road Chapel or posted on its website. Church Members will automatically be notified of any changes.

If you would like further information, or have any queries, problems or complaints relating to Trinity Road Chapel's Privacy Policy or any of our data handling practices in general, please contact the Data Protection Manager in writing at Trinity Road Chapel, 205 Trinity Road, Tooting, London. SW17 7HW, or by email at [dataprotection@trinityroadchapel.org](mailto:dataprotection@trinityroadchapel.org)

Please be aware that **AT ALL TIMES**, every effort should be made to keep any personal information confidential.

This privacy policy does not apply to any external links or other websites.

This policy was agreed by the trustees named below to be the official Privacy Policy of Trinity Road Chapel.

- |    |                 |            |                        |
|----|-----------------|------------|------------------------|
| 1. | Stuart W Davis  | Signature: | <i>Stuart W Davis</i>  |
| 2. | George M Mmbago | Signature: | <i>George M Mmbago</i> |
| 3. | Nigel J Warner  | Signature: | <i>Nigel J Warner</i>  |
| 4. | David R Blake   | Signature: | <i>David R Blake</i>   |

Date: *25<sup>th</sup> May 2018*

**Disclaimer:-**

Whilst every effort is made to ensure the accuracy of this information, the Trustees for Trinity Road Chapel do not represent, warrant, undertake or guarantee that the information in this publication will lead to any particular outcome or result, or to the completeness, reliability and accuracy of the information set out.

The Trustees of Trinity Road Chapel reserve the right to revise this publication and to make changes to it from time to time without obligation to notify any person or organisation of such revision or change.

All the information contained in this publication is produced in good faith and for general information purposes only. The information is not legal advice and should not be treated as such.