

## General Privacy Notice

**This Privacy Notice is for non-role holders. If you hold a role within the Parish, such as Churchwarden, member of the PCC, or volunteer, please see our separate Privacy Notice for Role Holders. Both notices are similar, but there are additional purposes and legal bases for processing personal data for role holders.**

### 1.0 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:

- Data Protection Act 2018
- UK General Data Protection Regulation (UK GDPR)

### 2.0 Who are we?

This Privacy Notice is provided to you by the [Parochial Church Council \(PCC\) of the Ecclesiastical Parish of Saint John the Apostle and Evangelist, Watford](#), which is the data controller for your data.

The Church of England is made up of a number of different organisations and office-holders who work together to deliver the Church's mission in each community. The PCC works together with:

- The incumbent of the parish (that is, our vicar Fr Corniel Quak);
- The Area Dean and other Church of England churches in the Watford Deanery and, on occasion, their incumbents and PCCs;
- The bishops of the Diocese of St. Albans;
- The St. Albans Diocesan Fund, which is responsible for the financial and administrative arrangements for the Diocese of St. Albans.

As the Church is made up of all of these persons and organisations working together, we may need to share personal data we hold with them so that they can carry out their responsibilities to the Church and our community. The organisations referred to above are joint data controllers. This means we are all responsible for how we process your data.

Each of the data controllers has their own tasks within the Church 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 by the PCC on our own behalf and on behalf of each of these data controllers. In the rest of this Privacy Notice, we use the word “we” to refer to each data controller, as appropriate.

### 3.0 What data for the data controllers above process?

Data controllers will process some or all of the following, where necessary to perform their tasks:

- Names, titles, aliases;
- Photographs and videos;

- o Contact details, such as telephone numbers, addresses, and email addresses;
- o Demographic information, such as gender, age, date of birth, marital status, nationality, education / work histories, academic / professional qualifications, hobbies, family composition, and dependents, where relevant to our mission or where you provide them to us;
- o Where you make donations or pay for activities, such as the use of a church hall, financial identifiers such as bank account numbers, payment / transaction identifiers, policy numbers, and claim numbers;
- o Other operational data created, obtained, or otherwise processed in the course of carrying out our activities, including, but not limited to, recording of telephone conversations; IP addresses and website visit histories; logs of visitors; logs of accidents, injuries, and insurance claims;
- o The data we process is likely to constitute special category 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 special category data, such as racial or ethnic background, sex life, mental and physical health, details of injuries, medication / treatment received, political beliefs, Trade Union affiliations, genetic data, biometric data, data concerning sexual orientation, criminal records, fines, and other similar judicial records.

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

The data controllers will comply with their 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; 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.

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

- o To minister to you and provide you with pastoral and spiritual care, such as visiting you when you are gravely ill or bereaved;
- o To organise and perform ecclesiastical services for you, such as baptisms, confirmations, weddings, and funerals;
- o To enable us to meet all legal and statutory obligations, which include maintaining and publishing our electoral roll in accordance with the Church Representation Rules;
- o To carry out comprehensive safeguarding procedures, including due diligence and complaints handling, in accordance with best safeguarding practice from time to time with the aim of ensuring that all children and adults at risk are provided with safe environments;
- o 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 the constitution and statutory framework of each data controllers;
- o To administer the parish, deanery, archdeaconry, and diocesan membership records;
- o To fundraise and promote the interests of the Church and charity;
- o To maintain our own accounts and records;
- o To process a donation you have made, including Gift Aid information;
- o To seek your views and / or comments;
- o To notify you of changes to our services, events, and role holders;
- o To send you communications which you have requested and which may be of interest to you. These may include information about campaigns, appeals, and other fundraising activities;

- To share your contact details with the Diocesan office so they can keep you informed about news in the diocese and events, activities, and services that will be occurring in the diocese which may be of interest;
- To process a grant or application for a role;
- To enable us to provide a voluntary service for the benefit of the public, in a particular geographical area as specified in our constitution.

## **5.0 What is the legal basis for processing your personal data?**

Most of our data is processed because it is necessary for our legitimate interests, or the legitimate interests of a third-party, such as another organisation in the Church of England. An example of this would be our safeguarding work to protect children and adults at risk. We will always take into account your interests, rights, and freedoms.

Some of our processing is necessary for compliance with a legal obligation. For example, we are required by the Church Representation Rules to administer and publish the electoral roll, and under Canon Law to announce forthcoming weddings by means of the publication of banns.

We may also process data if it is necessary for the performance of a contract with you, or to take steps to enter into a contract. An example of this would be processing your data in connection with the hire of church facilities or booking an event.

Religious organisations are also permitted to process information about your religious beliefs to administer membership or contact details.

Where your information is used other than in accordance with one of these legal bases, we will first obtain your consent to that use.

## **6.0 Sharing your personal data**

Your personal data will be treated as strictly confidential. It will only be shared with third parties where it is necessary for the performance of our tasks or where you first give us your prior consent. It is likely that we will need to share your data with or all of the following, but only where necessary:

- The appropriate bodies of the Church of England, including other data controllers;
- Our agents, servants, and contractors. For example, we may ask a commercial provider to send our newsletters on our behalf, or to maintain our database software;
- Other clergy or lay persons, nominated or licensed by the bishops of the Diocese of St. Albans to support the mission of the Church in our parish. For example, our clergy are supported by our Area Dean and Archdeacon, who may provide confidential mentoring and pastoral support. Assistant or temporary ministers, including curates, deacons, licensed lay ministers, commissioned lay ministers, or persons with Bishop's Permissions may participate in our mission to support our regular clergy;
- Other persons or organisations operating within the Diocese of St. Albans, including, where relevant, the St. Albans Diocesan Board for Education;
- On occasion, other churches with which we are carrying out joint events or activities.

## 7.0 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 of time. For example, it is currently 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. This means that we may delete it when it is no longer needed.

Much of the historic data for the Parish has been sent to the County Archive and we will continue to archive appropriate data with them. For example, old completed registers, PCC Minutes, Parish Accounts, and records of repairs, maintenance, and renewals to our fabric.

## 8.0 Your rights and your personal data

When exercising any of the rights listed below, in order 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.

You have the following rights with respect to your personal data:

1. The right to access information we hold on you.
  - At any point, you can contact us to request the information we hold on you, as well as why we have that information, who has access to the information, and where we obtained the information from. Once we have received your request, we will respond within one working month.
  - There are no fees or charges for the first request, but additional requests for the same data may be subject to an administrative fee.
2. The right to correct and update the information we hold on you.
  - If the data we hold on you is out of date, incomplete, or incorrect, you can inform us and your data will be updated.
3. The right to have your information erased.
  - If you feel that we should no longer be using your data or that we are illegally using your data, you can request that we erase the data we hold.
  - When we receive your request, we will confirm whether the data has been deleted or the reason why it cannot be deleted. For example, we may not delete data because we need it for our legitimate interests or regulatory purposes.
4. The right to object to processing of your data.
  - You have the right to request that we stop processing your data. 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. Even after you exercise your right to object, we may continue to hold your data to comply with your other rights or to bring or defend legal claims.
5. The right to data portability.
  - You have the right to request that we transfer some of your data to another controller. We will comply with your request, where it is feasible to do so, within one working month of receiving your request.

6. The right to withdraw your consent to the processing at any time for any processing of data to which consent was sought.
  - You can withdraw your consent easily by email or post (see 11.0 Contact Details below).
7. The right to object to the processing of personal data where applicable.
8. The right to lodge a complaint with the Information Commissioner's Office.

## 9.0 Transfer of data abroad

We do not share your information with countries or territories outside of the UK or EEA without the safeguards being in place that are compliant with UK GDPR or EU GDPR.

Our website is accessible from overseas so on occasion some personal data, such as in a newsletter, may be accessed from overseas.

## 10.0 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 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.

## 11.0 Contact details

Please contact us if you have any questions about this Privacy Notice or the information we hold about you, or to exercise all relevant rights, queries, or complaints at:

- By post: The Data Controller, St. John the Apostle and Evangelist, Sutton Road, Watford, WD17 2QQ.
- By email: [administrator@saintjohnswatford.org.uk](mailto:administrator@saintjohnswatford.org.uk); [churchwarden2@saintjohnswatford.org.uk](mailto:churchwarden2@saintjohnswatford.org.uk); and CC in [vicar@saintjohnswatford.org.uk](mailto:vicar@saintjohnswatford.org.uk)

You can contact the Information Commissioner's Office via telephone 0303 123 1113, online [Contact us | ICO](#), or in writing to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

## 12.0 Version Control

Version #	Author	Date	Summary of changes
01	PCC members	May 2018	New notice in line with legislative changes
02	Meg Murphy	July 2025	Minor refresh of notice, including: - updated contact information - updated ways we process personal data - updated URL links