**GDPR privacy policy, November 2018**

**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 Data Protection Act 2018.

1. **Who are we?**

Churches Together in Cumbria (CTiC) is the data controller, and the CTiC Executive Council is responsible for implementation of legal obligations (contact details at the end of this notice).  This means it decides how your personal data is processed and for what purposes.  The CTiC Executive Council may change this policy from time to time and any such changes will be published on our website.  Notwithstanding any change to this policy, we will continue to process your personal data in accordance with your rights and our obligations in law. The person normally responsible for implementation of CTiC’s data protection policy is the CTiC Administrator, who acts as data manager and who reports to the Honorary Treasurer.

1. **How do we process your personal data?**

We collect data necessary for CTiC to pursue its stated charitable objectives, and by running events, maintaining memberships, keep our members and supporters informed of our activities, marketing, fundraising and the effective running of CTiC through its staff, trustees and volunteers. In furtherance of this we use your personal data, which includes but is not limited to the following purposes: -

* Maintaining and updating lists of officers and groups that are part of CTiC
* Administrative support to committees of CTiC
* Recruitment to appointments and volunteer posts in CTiC
* Events management
* Issuing and arranging the distribution of publications, mailings and newsletters
* Financial services:
	+ Payment of expenses/invoices
	+ Payment of stipends/wages
	+ Administering income
* Fulfilling obligations under Health & Safety legislation
* Responding to general enquiries

Data collected and processed may include, but not be limited to:

* name and job title
* contact information including email address
* demographic information such as postcode, preferences and interests
* Sensitive data [[1]](http://www.methodist.org.uk/privacy-and-cookie-policy/%22%20%5Cl%20%22_ftn1) may be collected where necessary for safeguarding purposes, or for employment purposes, or where required by law.
1. **What is the legal basis for processing your personal data?**

Organisations are permitted to process data if they have a legal basis for doing so. CTiC processes data on the basis that:

* CTiC has a legitimate interest to process data; *and/or*
* Express and informed consent has been given by the person whose data is being processed; *and/or*
* It is necessary in relation to a contract or agreement which the person has entered into or because the person has asked for something to be done so they can enter into a contract or agreement; *and/or*
* There is a legal obligation on CTiC to process data; *and/or*
* Processing is necessary to protect the vital interests of a data subject or another person (in accordance with safeguarding policy and practice).
* Where we process special category sensitive data (under Article 9 of the GDPR) we process data on the basis that:
* Explicit consent has been given by the person whose data is being processed; *and/or*
* It is necessary for the CTiC Executive Council to carrying out its obligations under employment, social security or social protection law, or a collective agreement; *and/or*
* Processing is necessary to protect the vital interests of a data subject or another individual where the data subject is physically or legally incapable of giving consent; (in accordance with safeguarding policy and practice);
* Processing is necessary for archiving purposes in the public interest, or historical research purposes or statistical purposes.
1. **Sharing your personal data**

Your data will not be shared outside of CTiC, except where required to do so by law, or with trusted third parties where necessary to communicate with our members, office holders and volunteers (such as mailing companies for postal communications or through small email campaigns or newsletters), and only once satisfied that any such use of data will accord with this policy. Explicit, informed consent will be sought from individuals whenever and wherever required in accordance with data protection legislation.

1. **Security**

We are committed to ensuring that your information is secure.  In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the data we process.

1. **How long do we keep your personal data?**

We regularly review the data we hold and securely delete any personal data, including any paper records, that is no longer necessary for us to process. Data which is held because of a role that you hold will be deleted as soon as you relinquish that role. If we hold your data because you have opted to receive communications from us, we will ask you every three years if you wish to continue to receive such communications, and will delete your data if you do not wish to do so.

**8 Cookies**

The CTiC website ([www.churchestogethercumbria.co.uk](http://www.churchestogethercumbria.co.uk) ) creates ‘session cookies’. These are a default setting and expire when the user leaves the site.

**9 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 the CTiC Executive Council holds about you. This right may be exercised by contacting the CTiC Administrator ebctic@outlook.com or by writing to her, c/o Bishop’s House, Ambleside Road, Keswick CA12 4DD.
* The right to request that the CTiC Executive Council corrects 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 the CTiC Executive Council to retain such data. (Records will remain in skeleton, to ensure no further contact in future);
* The right to withdraw your consent to the processing at any time
* The right to request that the data controller provide the data subject with his/her personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable) [*Only applies where the processing is based on consent or is necessary for the performance of a contract with the data subject and in either case the data controller processes the data by automated means*].
* 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, (where applicable) [*Only applies where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics*]
* The right to lodge a complaint with the Information Commissioner’s Office.
	+ - 1. **Contact Details**

To exercise all relevant rights, queries of complaints please in the first instance contact the CTiC Administrator ebctic@outlook.com or c/o Bishop’s House, Ambleside Road, Keswick CA12 4DD.

You can contact the Information Commissioner’s Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.

[[1]](http://www.methodist.org.uk/privacy-and-cookie-policy/%22%20%5Cl%20%22_ftnref1) Article 9 GDPR defines sensitive data as information about an individual’s race, ethnic origin, politics, religion, trade union membership, genetics, biometrics (where used for ID purposes), health, sex life, or sexual orientation