



NORFOLK CHURCHES TRUST DATA PRIVACY STATEMENT

Preservation of your privacy is important to the Norfolk Churches Trust. We are committed to using your data responsibly, at all times in accordance with data protection law and your rights as an individual.

Who are we?

The Norfolk Churches Trust (“we”, “us” or “the Trust”) is a charity registered in England and Wales (Registered Charity number 271176), and a Limited Company (Registered Company no 1247797).

We are the data controller for the personal data that we collect and hold. This means we decide how your personal data is processed and for what purpose. This Notice sets out why we process your data and provides key information to enable you to understand how your data is used.

If you have any queries about this Notice or how we handle your information then please contact us at secretary@norfolkchurchestrust.org.uk or by post to Manor Farmhouse, Diss Road, Tibenham, Norwich NR16 1QF

What information do we process?

In order to carry out our charitable aims, we may process the following information:

- ³⁵₁₇ If you apply for Membership, we will collect and review the information you provide on the Membership Form, which includes the category of membership applied for, your name, address, contact details and payment information.
- ³⁵₁₇ If you are applying on behalf of or are a representative of a company or other body (such as PCC members), we ask for some of your personal details as a point of contact at the organisation you represent.
- ³⁵₁₇ If you are granted Membership, your details will be included on our Register of Members, this includes your name, address, contact details and the date on which you became a Member.
- ³⁵₁₇ If you are a supporter or a volunteer, we will collect the information you provide when signing up to attend or to volunteer at an event (such as the annual bike ride), which may include your name, address and contact details.
- ³⁵₁₇ If you agree to allow us to send you marketing or fundraising information, then we will collect your contact information for this purpose.
- ³⁵₁₇ When you get in touch with us about our activities we may collect information to enable us to respond to your enquiry.
- ³⁵₁₇ When you donate to us, we will collect your donation information and gift-aid information, we will also process payment details and contact information if you purchase merchandise from our website.

The data that you give us is provided on a wholly voluntary basis, though in some cases if we are unable to receive key information we may not be able to take your application or enquiry forwards, particularly if this means we are not able to meet our legal obligations.

Why do we need this information?

The Trust's overarching aim with all personal data it collects is to further the preservation, repair, maintenance and improvement of churches or chapels in Norfolk. It seeks to pursue this aim responsibly, and always in accordance with data protection law. The law requires us to have a 'lawful basis' for our processing activities. We have identified the following:

As we are a registered charity, some information (such as membership information required for our Register) is necessary for us to process in order to comply with our **legal obligations** under companies and charities law. In particular this means if you are a Member your details will be held on our Register and you will receive important Trust-related communications such as notice of AGMs, annual reports, minutes of meetings and accounts information. Records of donations will be held to ensure we can comply with our legal obligations for accounting and audit purposes.

We also ask our Members and supporters to allow us to hold their details to keep them informed of events and to send material that promotes the Trust and updates them on our activities. In most such cases we will only contact you on the basis of your **positive consent**. This is our key legal basis to promote the Trust and to seek to raise the funds we need as a charity.

In other cases, for example when we are updating details, responding to individual enquiries, providing administrative details of events (such as timings, changes in date etc), using non-electronic methods of communication or emailing individuals at businesses, or simply saying thank you for your participation or donation, we are likely to be doing so on the basis of the Trust's **legitimate interest** in the successful running of the charity. In these cases, we will only collect and use your details if this is not outweighed by your own right of privacy, or any overriding objection that you may have to the processing.

If there are any questions as to which lawful basis applies to any processing, please do not hesitate to contact membership@norfolkchurchestrust.org.uk.

How do we ensure accuracy of the data?

We aim to ensure that the information we hold is accurate and up to date. We may ask you to review and update your details periodically. If you identify any information that we hold that requires updating, then please do not hesitate to inform us at membership@norfolkchurchestrust.org.uk.

Who will see your information?

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to Trustees, those Trust staff and authorised third parties (such as volunteers) who have a need to know only where connected with Trust activities. They will only process your personal data on Trust instructions and will be subject to a duty of confidentiality.

By law, we are required to allow public access to our Register of Members provided the Trust is satisfied that any request to view the Register is for a proper purpose, and related to the activities of the Trust.

In some cases we may share information with third parties where they are providing a service to help the Trust to deliver our objectives, always ensuring compliance with data protection law. For example we use MailChimp to provide email campaign and marketing services, and rely on the support of Esteiro Business Solutions to provide our office administration platform.

Do we transfer any data internationally?

No, all data remains within the EEA.

How long is the information retained for?

We will keep your personal data only for as long as necessary for the purpose for which it was collected. For core membership information this may be for the duration of your membership and for any period where we are required by law or for purposes of good administration (such as for accounting or audit) to retain an ongoing record. For other categories of information, such as contact for marketing, we may review our records after a suitable period to check whether you are still happy to receive communications from us.

Where information is no longer necessary to be retained for the purpose it was collected, it will then be securely deleted (unless there is a good reason to retain such information such as for legal or for audit purposes).

Will we use any automated decision-making?

No. All applications are assessed by the NCT Board. We do not rely on any automated decision-making process.

What are your rights over your personal data?

Under certain circumstances, by law you have the right to:

³⁵₁₇ **Request access to your personal information** (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

³⁵₁₇ **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

³⁵₁₇ **Request erasure of your personal information.** This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

³⁵₁₇ **Object to processing of your personal information** where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.

³⁵₁₇ **Request the restriction of processing of your personal information.** This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

³⁵₁₇ **Request the transfer of your personal information** to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact us at secretary@norfolkchurchestrust.org.uk or by post to Manor Farmhouse, Diss Road, Tibenham, Norwich NR16 1QF.

Supervisory Authority

At any time, you also have a right to lodge a complaint with the Information Commissioner's Office at www.ico.org.uk. However if you do have any concerns we would appreciate the chance to deal with these to your satisfaction in the first instance, using the contact details above.

This privacy policy may be updated from time to time.

June 2019