

# **Somerset Churches Trust - Data Management Policy**

## **1. Introduction**

The Somerset Churches Trust (SCT) is an independent, non-denominational trust raising money for the repair and improvement of churches and chapels open for Christian worship in the historic county of Somerset. The Trust, founded in 1996 under the name Friends of Somerset Churches and Chapels, exists to encourage interest and the involvement of all members of the community in the magnificent heritage of our fine religious buildings. Already, since its founding, the Trust has made grants of almost £700,000 to over 300 churches and chapels in Somerset.

As part of its activities, the Trust collects and manages personal information provided by its members. This policy documents how the SCT will comply with the requirements of the General Data Protection Regulation 2018 and who within the Trust will be responsible for ensuring compliance.

The current use of personal information within the Trust appears to be in line with the exemption from registration with the Information Commissioners Office (ICO).

## **2. When and how we collect your personal information**

The Trust collects personal information about you in several ways:

- When you apply to become a member of the Trust or to renew your membership of the Trust.
- When you purchase anything from the Trust.
- When you apply for a grant from the Trust
- When you offer to take part in the annual "Ride+Stride" in aid of the Trust
- When you contact a Trustee or Management Committee member by post, phone, email or another method for any reason.

The Trust does not collect or hold any sensitive data about you (known as “special categories of data”) which might, for example, include data relating to your health, race or ethnic origin or religion.

## **3. What personal information do we hold or process?**

The Trust holds and/or processes the following personal information about you:

- Your name; and
- Your contact details including your postal address, telephone number and email address;

## **4. Our legal basis for using your personal information**

Under UK data protection law, we must have a valid lawful basis for using your personal information. We may not collect, store or use information other than as described in this policy. There are three ways in which we may have a lawful basis for using your personal information:

**Contract:** The majority of the information we collect from you is necessary to allow us to fulfil our contract with you or to enter into a contract with you. For example, upon paying a membership subscription, you provide us with a postal address to allow us to send your copy of our Annual Report and/or other literature;

**Legal obligation:** We may have a legal obligation to use your personal data in certain ways or to protect your interests, e.g. we may exchange information with organisations for the prevention of fraud.

**Legitimate interest:** We may use your personal data to send information to you about the Trust that we feel you may be interested in, e.g. an Area Co-ordinator may contact you to advise of events or activities that you might be interested in attending.

## **5. How do we use your personal information?**

We use the personal information that you provide for the following purposes:

- To service your membership. This includes the routine sending of our Annual Report and Events leaflet; and
- To inform you of, or invite you to participate in, current activities within the Trust, eg. Details of Church Crawls and meetings of interest.

We respect your privacy, and will not sell or lease your personal information on to third parties.

## **6. How long will we keep your personal information?**

We will never keep your data for longer than is necessary for us to complete financial transactions or whilst you remain a member of the Trust. If a member fails to pay their subscription, they have technically ceased to be a member of the Trust. However, some members can be slow at renewing their subscription. We have therefore decided to retain the personal information of ex-members for a period of three years in order to deal with late renewals.

Additionally, we are required by HM Revenue & Customs to retain details of the Trust's financial transactions, including your payments, for a period of six years.

## **7. How can you access the personal information we hold?**

You have the right to request a copy of the personal information that we hold about you. This is known as a "Subject Access Request" (SAR). We will provide this to you free of charge within 30 days of receiving your request.

If you would like a copy of some or all of your personal information, you should contact our Membership Secretary by email or post.

## **8. How we keep your personal information up-to-date**

We have a legal obligation to keep the personal information we collect up-to-date and accurate. You have the right to ask us to correct any inaccuracies in the personal information we hold about you and to restrict the use of your information until it has been corrected.

We keep your information accurate as follows:

- By giving you the opportunity to contact us at any time to correct or change your information.
- By updating our records when we receive undelivered mail or email. Those email addresses which are found to be 'bouncing' for whatever reason are deleted from the members record.

The simplest way to keep your data accurate is to review the information printed on your magazine mailing sheet and to contact us if there are any inaccuracies.

### **9. How we keep your personal information safe**

The Trust's management committee and officers view the protection and security of our members' data as of high importance. We use administrative and electronic security measures to ensure the information we collect about you is protected from access by unauthorised persons and protected against unlawful processing, accidental loss, destruction or damage.

In addition, officers dealing with members' financial information are required to follow and recertify annually, compliance with the Data Security Standards of the payment card industry.

All Trust officers are made aware in writing of these requirements on taking up their posts and are reminded when key documents such as membership lists are distributed to them. Responsibility for briefing new Trust committee members and officers lies with the Treasurer. In the event of the Treasurer being unable to carry out this task, then the Chairman shall be responsible for ensuring that the briefing is carried out.

### **10. Data Controller**

The 'Data Controller' (as defined in data protection legislation) is the Trust's Membership Secretary and holds responsibility for ensuring that this policy is complied with. Contact should be made through the Secretary initially at [info@somersetchurchestrust.org](mailto:info@somersetchurchestrust.org)

### **11. What to do if you have a complaint about our use of your personal information**

If you have a complaint about the information we hold or how we use that information, please contact our Secretary who will deal with your complaint. If you are not satisfied with the way your complaint was handled, you can refer your complaint to the UK Information Commissioner's Office.

### **12. Disclaimer**

Every effort is made to ensure that the information provided in this policy is accurate and up-to-date, but no legal responsibility is accepted for any errors or omissions contained herein. This policy applies solely to the data collected by the Trust, and does not apply to data collected by third parties that are not under our control. We cannot be held responsible for the data management/privacy policies of third parties, and we advise users to read these carefully before providing any personal data.

Signed:

.....Chairman

.....Secretary

Date: .....

## **Appendix A – Membership Lists**

### **A1. Introduction**

The Trust's membership records are maintained by the Data Controller. In order to facilitate the smooth running of the Trust, he/she may distribute a membership list at occasional intervals to relevant Trust Management Committee officers. The membership list contains member's name, address, telephone number, email address, and a recent history of subscription payments

### **A2. Who is entitled to hold copies of the membership list?**

To be determined by the Management Committee.

### **A3. Data storage and protection**

The master copy of the membership list is held on computer file by the Data Controller, who is also responsible for primary backup. A second backup copy of the membership list should be given to another Trust officer on a regular basis; this protects against total loss of the Data Officer's systems. Currently (Oct 2018) the second backup goes to the ManComm. Chairman.

All membership lists sent to other Trust Committee Members and Officers shall be password protected, the password being sent by separate means.

### **A4. Moving membership data outside of Europe.**

Data protection legislation forbids the movement of data outside of Europe without explicit member consent. Therefore, no membership list (complete or partial) should be sent outside of Europe without gaining consent from every person on that list.

### **A5. Deletion of old data.**

If a member fails to pay their subscription, they have technically ceased to be a member of the Trust. However, some members can be slow at renewing their subscription. We have therefore decided (as noted in Section 6 of the Data Management Policy above) to retain the personal information of ex-members for a period of three years in order to deal with late renewals or members rejoining within that period.

The ex-member list (ie. people whose subscription is overdue) should only be distributed to those with clear need to see its contents.

The personal information of ex-members whose subscription is three years overdue should be deleted from all Trust records.