



Data Protection Policy

Your Personal Data- What is it?

Personal data relates to a living individual who can be identified from that data. Identification can be by 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 and other relevant laws and regulations in England & Wales.

Who are we?

Freedom Church Network (FCN) is the data controller. This means we decide how your personal data is processed and for what purposes.

Organisation Name	Freedom Church Network
Charity Number	1195962
Email address	s.whybrew@wearefreedomchurch.co.uk

How do we process your Personal Data?

FCN complies with its legal obligations by not keeping excessive amounts of data, by protecting personal data from loss, misuse, unauthorised access and disclosure, and by ensuring that appropriate technical measures and training are in place to protect your personal data.

We use your personal data for the following purposes:

- To administer membership records
- To manage your donations and Gift Aid declarations
- To promote the activities of our churches and the interests of the charity
- To manage our volunteers and employees
- To make contact with individuals for pastoral care
- To make referrals to social services where there are identified concerns in line with our Safeguarding Policy.

Who has access to your personal data?

Employees and volunteers may have access to your personal data in order to fulfil the purposes set out above. They are responsible for the secure storage of your data and for only using it for the required purposes. They will treat your personal data as strictly confidential, and will seek your permission to share it, where that it possible, only sharing it without your permission when there is a legal justification and you are at risk of harm, for example, for urgent medical care or for a referral to social services or to the police.

Employees and volunteers to follow the guidance in Appendix 1. If due care is not given to protecting personal data this may be a matter of misconduct and an employee may face disciplinary action in line with procedures set out in the Employee Handbook. A volunteer may lose their responsibilities if they are found not to be taking adequate care of personal data.



What is the Legal Basis for Processing your Personal Data?

We require explicit consent of the data subject so that we can keep you informed about news, events and activities by email. To do this we ask you to complete a contact card or online form, and request that you indicate you are happy to hear from us about future activities.

Processing your personal data is necessary for carrying out our legal obligations in relation to gift aid, expense payments, and safeguarding duties as stated above.

Sharing your Personal Data

Your personal data will be treated as strictly confidential and will only be shared with other leaders within your church for the purpose of providing you with the information you have requested, managing your donations and keeping you safe from harm.

We may share your personal data with third-party platforms only for the purpose of enabling us to fulfil one of the outlined purposes for processing your data.

How Long Do We Keep Your Personal Data?

We only keep your personal data whilst we have a legitimate reason, or legal requirement to do so. For example, whilst you attend church activities and have not informed us you are leaving the church. We will hold financial data for up to 6 years after the calendar year to which they relate unless you hold an active ongoing gift aid declaration. Where we hold personal data related to safeguarding concerns this will be held securely for up to 20 years after the concern is raised.

Your Rights and Your Personal Data

Unless subject to a specified exemption set out in data protection law, you have the following rights with respect to your personal data:

- The right to request a copy of your personal data
- The right to request the correction of any personal data found to be inaccurate or out of date
- The right to request your personal data is erased where it is no longer necessary to retain such data
- The right to withdraw your consent to the processing or parts of 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)
- 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)
- The right to lodge a complaint with the Information Commissioner's Office.

Please inform the church of any updates to your personal data, if you do not make any amendments to the information or ask us to stop processing your information, we will continue to process your information as per the previous year providing there is justifiable cause for us to do so.

Further Processing

Where and whenever necessary, we will seek your prior consent to new processing. If we wish to use your personal data for a new purpose, not covered by this Data Protection 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.



Contact Details

To exercise all relevant rights, queries or complaints please in the first instance contact the charity Data Protection Officer, Sarah Whybrew s.whybrew@wearefreedomchurch.co.uk

You can contact the Information Commissioner's Office on 0303 123 1113 or via or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.



Appendix 1 - Organisational security requirements to be followed by employees and volunteers

Devices

- All devices used for personal data processing for church activities to have multi-factor authentication, where possible.
- All devices to have a password / pin in place to ensure that if lost or stolen personal data is not easily accessible.
- Password policy on device to mandate periodic changes of password, and passwords not to be given out to others.
- Care to be taken with devices belonging to the church, ensuring that items are not easily lost or stolen.

Files

- Files containing personal data to be stored on Church Microsoft Teams files/Sharepoint and therefore only accessible by those with a log in.
- Access to be limited to those that need it.
- Files only to be retained for as long as necessary – with periodic system reviews by administrator and Pastor/Trustee.
- Retention periods to be identified by each church for membership records.