# General Privacy Notice

**Parochial Church Councils of All Saints Biddenden and St Michael the Archangel, Smarden**

## What is personal data?

Personal data is any information about a living individual that can identify them, either on its own or when combined with other information. This may include a name, photograph, video, email address or postal address.

The processing of personal data is governed by the UK data protection legislation, including the General Data Protection Regulation 2016/679 ("GDPR"), the Data Protection Act 2017, and other legislation relating to personal data and individual rights, such as the Human Rights Act 1998.

## Who we are

This Privacy Notice is provided by the Parochial Church Councils ("PCCs") of All Saints Biddenden and St Michael the Archangel, Smarden. The PCCs are the data controllers for your personal data.

### People who may process data within the parish

- The incumbent of the benefice, that is, our rector
- The Churchwardens
- The PCC Treasurer
- The PCC Covenant Secretary
- The Parish Magazine editor
- The Parish Magazine distributors
- The Parish Administrator
- The Parish Disclosure Officer
- The Child and Adult Protection Officer

### Organisations we may need to share information with

We may have a legal duty to send some information outside the parish to:

- The Diocese of Canterbury and the Diocesan Offices, including the offices of the Archdeacons, which are responsible for financial and administrative arrangements for the Diocese of Canterbury
- The Bishop's office
- The Registrar for births, deaths and marriages

Because the Church is made up of people and organisations working together, we may need to share personal data with them so they can carry out their responsibilities to the Church and our community. The organisations listed above are joint data controllers. This means we are all responsible to you for how your data is processed.

Each data controller has its own role within the Church. This Privacy Notice explains what data is processed and why. It is given by the PCCs on our own behalf and on behalf of each of these data controllers. In the rest of this Notice, "we" refers to each data controller, as appropriate.

# What information we process

Each data controller may process the following types of personal data:

- Names, titles, aliases and photographs
- Contact details, such as telephone numbers, postal addresses and email addresses
- Where relevant to our mission, or where you provide it to us, demographic information such as gender, age, date of birth, marital status, nationality, education or work history, academic or professional qualifications, hobbies, family composition and dependants
- Where you make donations or pay for activities, such as use of a church hall, financial identifiers such as bank account numbers, payment card numbers, payment or transaction identifiers, policy numbers and claim numbers
- Some information may be sensitive personal data. Because we are a church, the fact that we process your data may suggest your religious beliefs. Where you provide it, we may also process other sensitive personal data, including racial or ethnic origin, sex life, mental or physical health, details of injuries, medication or treatment received, political beliefs, labour union affiliation, genetic data, biometric data, sexual orientation, and criminal records, fines or similar judicial records.

# How we use your personal data

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

- To meet legal and statutory obligations, including maintaining and publishing the electoral roll under the Church Representation Rules
- To carry out safeguarding procedures, including due diligence and complaints handling, in line with safeguarding best practice, so that children and adults at risk are provided with safe environments
- To provide pastoral and spiritual care, such as visiting those who are ill or bereaved, and to organise and perform ecclesiastical services, including baptisms, confirmations, weddings and funerals
- To support the Church's mission in our community and carry out voluntary or charitable activities for the public benefit
- To administer parish, deanery, archdeaconry and diocesan membership records
- To fundraise and promote the interests of the Church and charity
- To maintain accounts and records
- To process donations, including Gift Aid information
- To seek your views or comments
- To notify you of changes to services, events and role holders
- To send communications you have requested and that may be of interest to you, including information about campaigns, appeals and fundraising activities
- To process a grant or an application for a role
- To provide a voluntary service for the benefit of the public in a particular geographical area, as set out in our constitution
- To publish and distribute a monthly parish magazine
- To operate CCTV systems for the prevention and prosecution of crime. Further details are set out in the CCTV section below.

# 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 within the Church of England. For example, safeguarding work helps protect children and adults at risk. We will always take your interests, rights and freedoms into account.

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

We may also process data where it is necessary to perform a contract with you, or to take steps before entering into a contract. Examples include processing data connected with hiring church facilities or where you are a contractor carrying out work on site for us.

Religious organisations are permitted to process information about religious beliefs for the administration of membership or contact details.

Where we use your information for any other purpose, we will first obtain your consent.

# Sharing your personal data

Your personal data will be treated as strictly confidential. It will only be shared with third parties where this is necessary for our tasks, or where you have given prior consent. Where necessary, we may share your data with:

- Appropriate bodies of the Church of England, including the other data controllers
- Our agents, servants and contractors, such as a commercial provider used to send newsletters or maintain database software
- Other clergy or lay persons nominated or licensed by the bishops of the Diocese of Canterbury to support the mission of the Church in our parishes, including area deans, lay chairs, archdeacons, curates, deacons, licensed lay ministers, commissioned lay ministers and people with Bishop's Permissions
- Other persons or organisations operating within the Diocese of Canterbury, including, where relevant, Canterbury Diocesan Enterprises Ltd and Aquila, the Diocese of Canterbury Academies Trust
- Other churches with which we carry out joint events or activities
- The Registrar for births, deaths and marriages

# How we store personal data and how long we keep it

The data controllers will comply with their legal obligations to keep personal data up to date, store and destroy it securely, avoid collecting or retaining excessive amounts of data, keep it secure, protect it from loss, misuse, unauthorised access and disclosure, and ensure that appropriate technical measures are in place.

- All computers that store personal data are password protected.
- Some records are kept permanently where we are legally required to do so. Other records may be kept for an extended period.
- Financial records are kept for seven years to support HMRC audits.

- Marriage-related information is kept for five years, as required by the Registrar.
- Information relating to baptisms and funerals is retained for ten years. Applications for burial in the churchyard are retained permanently.
- Parish magazine images: for historical interest, we retain an electronic copy of each parish magazine.
- Registers for Sunday school and children's events, and consent forms, are kept indefinitely.

# Your rights

When you exercise any of the rights below, we may need to verify your identity for your security. In such cases, you will need to provide proof of identity before we can process your request.

You have the following rights in relation to your personal data:

1. **Access:** You can ask for the information we hold about you, why we hold it, who has access to it and where it came from. We will respond within one month of receiving your request.
2. **Fees:** There is no fee for the first request. Additional requests for the same data may be subject to an administrative fee.
3. **Correction:** You can ask us to correct or update information that is out of date, incomplete or incorrect.
4. **Erasure:** You can ask us to delete your information. We will confirm whether it has been deleted or explain why it cannot be deleted, for example where we need it for legitimate interests or regulatory purposes.
5. **Objection:** You can ask us to stop processing your data. We will tell you whether we can comply or whether we have legitimate grounds to continue. Even after an objection, we may continue to hold data where needed to comply with your other rights or to bring or defend legal claims.
6. **Data portability:** You can ask us to transfer some of your data to another controller. Where feasible, we will do this within one month of receiving your request.
7. **Withdrawal of consent:** Where processing is based on consent, you can withdraw that consent at any time by telephone, email or post. See Contact Details below.
8. **Complaint:** You have the right to lodge a complaint with the Information Commissioner's Office.

# CCTV and surveillance

All Saints Biddenden operates a CCTV system to support public and staff safety, crime prevention and detection. Only the Incumbent and Churchwardens can view recorded images. These roles require Disclosure and Barring Service checks.

CCTV images are automatically deleted after a period of time, usually between two weeks and two months, depending on how often the system is activated.

In some circumstances, images may need to be kept for longer, for example where a crime is being investigated. You have the right to see CCTV images or audio recordings of yourself, in accordance with the Data Protection Act, and to be provided with a copy.

We will only disclose images and audio to authorised bodies intending to use them for the purposes stated above. Images and audio will not be released to the media for entertainment purposes or placed on the internet for public viewing.

We operate CCTV and disclose information in accordance with codes of practice issued by the Information Commissioner. We are registered with the Information Commissioner.

## Transfer of data abroad

Any electronic personal data transferred to countries or territories outside the EU will only be placed on systems that provide equivalent protection of personal rights, either through international agreements or contracts approved by the European Union.

Our website is accessible from overseas, so personal data, for example in a newsletter, may occasionally be accessed from outside the EU.

## Further processing

If we wish to use your personal data for a new purpose not covered by this Notice, we will provide a new notice before starting that processing. The new notice will explain the purpose and processing conditions. Where necessary, we will seek your prior consent.

## Contact details

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

The Data Controller, c/o The Benefice Administrator, 36 High Street, Biddenden, Kent TN27 8AH.

## Review of this document

This Privacy Notice will be reviewed regularly by the PCCs and updated as necessary.

This policy was reviewed and approved by the PCC on 08 09 2026.

The next review date will be the first PCC meeting after the 2027 APCM.

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