



HOLY TRINITY, PRESTWOOD AND ST. MARY MAGDALENE, GREAT HAMPDEN

140 Wycombe Road, Prestwood, Great Missenden,
Buckinghamshire, HP16 0HJ
rector@htprestwood.org.uk 01494 866530

RECTOR: THE REVEREND DEINIOL HEYWOOD

Holy Trinity, Prestwood Data Procedures

Introduction

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 General Data Protection Regulation (the "GDPR").

Religious data is deemed to be sensitive data by the GDPR. As all the data we hold can be seen to be indicative of religious belief, even when this data is not actually stored, we treat all the data we hold as though it were sensitive.

Storage and Security.

Personal data is held digitally by church officers, employees and designated church volunteers and is also held in paper format.

The church office will maintain an up-to-date record of where data is located, and who has access to it. This is known as the data audit.

Where data is stored electronically, it is to be stored with suitable security measures in place. People with access to the database sign up to these procedures.

Where data is stored in paper form, it will be kept under lock and key when not in use.

Individuals do not freely make additional copies of the data e.g. for use at home.

As the church carries out its legitimate interests we may share some information as set out in our privacy notice. Volunteers who have access to our data are:

- briefed about the requirements of the GDPR in relation to the data they access and/or hold
- advised to store as much information as possible in the parish office
- asked to forward data to their successor or return to the church office or destroy the data when they finish their voluntary role.

Data Subject Requests

1. A data subject may request a copy of all data we hold about them.
2. They can do this by writing to the Rector at 134 Wycombe Road Prestwood, Great Missenden HP16 0HJ giving their name and address
3. We will inform the Diocesan Secretary and the Diocesan Registrar whenever we receive a Subject Access Request.
4. We will respond within thirty calendar days listing the data we hold about them in each of the places identified by the data audit or stating that we do not hold any information about them.
5. To do this we may have to contact the people identified by the data audit who are holding data on behalf of the Rector and the PCC.

Data Correction

1 On being notified of an error in the data we will correct data in the in all the records we identify from the data audit and report to the data subject that the data is corrected

Right to be forgotten

1. A data subject may request that we delete all the data we hold about them.
2. They can do this by writing to the Rector at 134 Wycombe Road Prestwood, Great Missenden HP16 0HJ giving their name and address
3. We will inform the Diocesan Secretary and the Diocesan Registrar whenever we receive a data deletion request.
4. We will respond within thirty calendar days confirming that they have been deleted from our records except where we have a legal obligation to retain their information.
5. To do this we may have to contact the people identified by the data audit who are holding data on behalf of the Rector and the PCC.

Breach

If a data breach is identified, we will

1. Notify the Diocesan Secretary, the Diocesan Registrar and, if advised by them the Information Commissioner.
2. Analyse severity and impact
3. Contact people whose data may have been accessed.
4. Review policies, procedures and training
5. Report to PCC

Approval

These procedures have been approved by the PCC and the incumbent

On: _____

Signed: _____
(Incumbent)

Signed: _____
(Church Warden)

Signed: _____
(Church Warden/ PCC Secretary))