

SS PHILIP & JAMES PARISH CHURCH, WHITTON

DATA POLICY

The Parochial Church Council of Ss Philip & James [the "PCC"], Whitton are the primary Data Controller with direct responsibility for the security and appropriate use of personal and/or sensitive data received by the Parish in its work. They work with other Data Controllers that comprise the national Church of England

The PCC recognizes and acts in accordance with the Data Protection Act (1998) and will act in accordance with the General Data Protection Regulation [the "GDPR"] that comes into effect on May 25th 2018.

The PCC, in its role as Data Controller, takes the security of personal information seriously, and will undertake to operate as follows:

1. We will gather and store personal data only where required under the Lawful Bases established for Ss Philip & James Parish Church, Whitton (www.whittonchurch.com/privacy). Data will be collected for specific purposes, with explicit consent where required, for as long as necessary, and will store it securely. These purposes, and the requirements for consent are set out in the General Privacy Notice;
2. To aid it in its task as Data Controller, the PCC will appoint and train a Data Officer who will administer the day-to-day needs of the GDPR;
3. Wherever possible, all personal data will be stored digitally and securely. Where possible and appropriate, personal data received in paper form will be scanned into an electronic file, and stored securely. All paper applications will be safely destroyed;
4. Access to personal data will only be granted to third parties by the Data Controller in accordance with the stipulations of the GDPR and where that third-party has a legitimate need to receive it;
5. In accordance with individuals' rights, we will receive and process any Subject Access Requests [or "SARs"] in the time prescribed by the GDPR, and to fully protect all data we reserve the right to seek formal identification from anyone applying for a SAR;
6. Where there is a 'data breach' (accidental or deliberate loss, damage or destruction of personal data), the PCC will contact the Information Commissioner's Office [the 'ICO'] as directed by the GDPR;
7. The Data Controller will promote a responsible digital culture where personal information is given the greatest protection. The use of Emails that take place on the part of the Data Controller, its employees, its subsidiary organisations and appointed officers in accordance will do so under the guidance set out in the document '**Looking After Your Emails**', (*Church of England, 2013*)
8. Any paper files that are kept, where not covered by the provision given above in No 3, will be stored and destroyed in accordance with the guidance set out in the document '**Keep or Bin ..? The Care of Your Parish Records**' (*Church of England, 2009*)
9. The PCC will review this policy, its responsibilities and its practices under the GDPR annually;

Signature _____ (Incumbent)

Date _____