

GENERAL PRIVACY NOTICE OF THE LDF

Introduction to the Privacy Notice

The London Diocesan Fund (LDF) needs to use information to support the mission and growth of the Church in London. We use the personal data which you have given us, or which we've collected, usually from our Bishops' offices or our parishes.

Why do we need a Privacy Notice?

Data Protection regulation in the UK requires all organisations to inform individuals about the personal data they hold and use, and the reasons for this. This Privacy Notice is intended to make it easier for you to find out how we use and protect your information.

Who does this Notice apply to?

This Privacy Notice is for all those whose personal information is dealt with in any way by the LDF including lay officers, clergy, employees, volunteers, contractors, suppliers, tenants and clients, but there may be others. So, you may be a church warden in the diocese, a representative of your parish on a diocesan body, a church treasurer, an employee, a person contracted to carry out work or a tenant, for instance.

How this Privacy Notice relates to you

We want to be open and transparent about how we use your personal data. We are a charity, a limited company, and subject to ecclesiastical law and we have a surprisingly broad array of tasks and responsibilities. So we have a long list of the different types of data that we might use.

Hence we've set out a range of scenarios to cover why we might process **your data**. Even if the examples don't all apply to you, we think it is more straightforward to have a single document that covers as many eventualities as possible.

Our Privacy Notice has in it what Data Protection regulations, requires us to include, and it covers:

1. Your personal data – what is it?
2. Who are we?
3. What is the lawful basis for processing your personal data?
4. How does the LDF process your personal data, and for what purposes?
5. Sharing your personal data
6. How long do we keep your personal data?
7. Your rights and your personal data
8. Transfer of data abroad
9. Further processing
10. Contact details
11. Changes to this Notice

The LDF holds a range of data. Do you hold all of this information about me?

No we don't; only a limited amount of examples in the Notice will apply to you. This will generally be data you have given us, and relevant information collected mostly from parishes to enable you to carry out your role. As the Notice is for everyone, the list under section 4 about the purposes for which we use personal data is long.

Privacy Notice

1. Your personal data – what is it?

“Personal data” is any information about a living individual which allows them to be identified from that data (for example a name, photographs, videos, email address, or address). Identification can be by the information alone or in conjunction with any other information. The processing of personal data is governed by the Data Protection Act 2018, the ‘UK GDPR’ which is the retained EU law version of the General Data Protection Regulation (EU) 2016/679, and other legislation relating to personal data and rights such as the Human Rights Act 1998.

2. Who are we?

This Privacy Notice is provided to you by the London Diocesan Fund (LDF) who is the data controller for your data, which we hold and use. This means that we, the LDF, are responsible to you for how we process your data.

3. What is the lawful basis for processing your personal data?

The GDPR requires specification in the Privacy Notice of the lawful basis for processing personal data. Below are the lawful bases which are relevant for our processing activities.

- **legitimate interests**, or the legitimate interests of a third party (such as another organisation in the Church of England)
- compliance with a **legal obligation**
- performance of a **contract**, or to take steps to enter into a contract
- to protect a person’s **vital interests**
- where **consent** has been obtained
- when processing is necessary for tasks in the **public interest**

Religious organisations are also permitted to process information which reveal a person’s religious beliefs, to administer membership or contact details.

4. How does the LDF process personal data?

The LDF will comply with its legal obligation to keep personal data up to date; to store and destroy it securely; not to collect or retain excessive amounts of data; to keep personal data secure, and to protect personal data from loss, misuse, unauthorised access and disclosure and to ensure that appropriate technical measures are in place to protect personal data.

We use your personal data for purposes included amongst the following:

Overall purposes

- a) To enable us to meet all legal and statutory obligations.
- b) To deliver the Church’s mission to our community, and to carry out any other voluntary or charitable activities for the benefit of the public as provided for in our constitution and our statutory framework.
- c) To promote and assist the mission and growth of the Church of England in the Diocese of London whatever for the time being shall be the area of the Diocese called “the Diocese of London”, and in particular to organise and provide funds for departments of the Church’s work as noted in the LDF’s Memorandum and Articles of Association.
- d) To carry out comprehensive safeguarding procedures (including due diligence and complaints handling) in accordance with best safeguarding practice from time to time with the aim of ensuring that all children and adults-at-risk of abuse or neglect are provided with safe environments.

In carrying out our overall purposes

- e) To administer the necessary parish, deanery, archdeaconry and diocesan membership records, events and activities,
e.g. re: Clergy and lay people – for those involved in governance bodies at Diocesan and Area levels, we use the information you have provided on the lawful basis of legal obligation to support the work of the statutory bodies, such as the Synod and Trustee body; and for our legitimate interests, to take forward significant work relating to the sub-committees and groups, which enable you to carry out your roles effectively.

e.g. re: Lay people - church officers, such as churchwardens, PCC Secretaries, treasurers, Deanery Synod members, and those with other key roles in the church, similar to above we use your contact details and other relevant data, usually collected by the parishes, to support you in your various roles. Without such information it would not be possible for you to function effectively in your role for your church.

- f) To fundraise and promote the interests of the church and charity. e.g. information supplied by donors to use in supporting our work.
- g) To maintain our own accounts and records.
e.g. re: Contractors, suppliers and tenants – for putting agreements in place, invoicing and making payments. Personal data held in this regard forms part of our contractual arrangements with you.
- h) To seek your views or comments;
- i) To notify you of changes to our services, events and role holders. e.g. those who sign up to receive newsletters.
- j) To send you communications which you have requested, or that may be of interest to you. These may include information about campaigns, appeals, or other fundraising activities. e.g. those who make donations to the LDF
- k) To process a grant or application.
- l) To enable the clergy to undertake pastoral care duties as appropriate.
- m) To manage our employees, volunteers and contractors. We will process data about individuals for legal, HR, administrative and management purposes and to enable us to meet our legal obligations.
e.g. re: Employees – to pay you, according to our contract with you; to monitor your performance, which we have a legitimate interest to do in taking forward the LDF's aims and objectives; and to confer benefits, such as sick pay, which we have a legal obligation to do.
During the course of your employment information you have given us may be shared with other LDF officers and our external agents (e.g. our payroll processors) to enable us to manage your employment and comply with our policies and procedures, e.g. prevention of illegal working, disciplinary, grievance, and performance management policies. Your information will be held securely in compliance with our retention/data deletion policy and where relevant, individual policies which reflect these arrangements.
- n) We may process special categories of personal data relating to individuals including, for example as appropriate:
- information about a physical or mental health condition in order to monitor sick leave and take decisions as to the individual's fitness for work;
 - the individual's racial or ethnic origin or religious or similar diversity data in order to monitor compliance with equal opportunities legislation;
 - in order to comply with legal requirements and obligations to third parties.
- o) Our processing may include the taking of photographs, filming and live streaming of particular events for use in promotional or training events, and which may appear in promotional material and/or on our intranet and website. Our website is also accessible from overseas.
e.g. re: Employees and office holders' photographic ID passes. The LDF has a legitimate interest in providing these for the safety of diocesan officers and staff.
- p) Our processing also includes the use of CCTV systems for the prevention and prosecution of crime.
- q) Individuals' data is processed for the purposes of elections under the Church Representation Rules and the Election Rules of the Three Houses of the General Synod.
For more information about the types of data that the LDF collects and the reasons for processing please contact us via one of the methods outlined in section 11 .Contact Details.

5. Sharing your personal data

In order for us to effectively and efficiently function we are required to share data with appropriate third parties.

Personal data will only be shared when appropriate security protections have been put in place . It will only be shared with third parties including other data controllers where it is necessary for the performance of the LDF's tasks which include but is not limited to:

- The Bishops of the Diocese of London;
- PCCs and incumbents of parishes in the Diocese;

- Other ordained or lay persons nominated or licensed by the bishops of the Diocese of London to support the mission of the Church in the diocese;
- The appropriate bodies of the Church of England;
- Our agents, advisers contractors and service providers. For example, we may ask a commercial provider to send out newsletters on our behalf; to maintain our database software; or undertake payroll;
- Financial organisations e.g., Pension provider, HMRC;
- Police forces, courts, tribunals, Security organisations- to create a secure workplace for all staff;
- Employment & recruitment agencies and future employers - to support reference requests;
- Other persons or organisations operating within the Diocese of London including, where relevant, the London Diocesan Board for Schools and Subsidiary Bodies.

6. How long do we keep your personal data?

In general, we will endeavour to keep data only for as long as we need it. This means that we will delete it when it has served its purpose or at the end of a mandated legal retention timeframe. For example, it is current best practice to keep financial records for a minimum period of 6 years to support audits from external bodies. For further information regarding our approach to data retention, please see our data retention policy, a copy of which can be requested from the Data Protection Officer (see section 11 for contact details).

7. Your rights and your personal data

You have the following rights with respect to your personal data:

1. To access information we hold on you – in the interest of clarity we ask that *you submit any requests in writing via any of the channels outlined in section 11. Contact Details.*
2. To rectify inaccurate information, or update incomplete information we hold on you - *we may require supplementary information in order to make any relevant changes.*
3. To have any data erased which is no longer required or should no longer be held *also known as the “right to be forgotten”*.
4. To restrict the processing of your data – *you can limit or suppress how your data is being used.*
5. To moving, copy or transfer your data (data portability) – *you can request data being electronically transferred to another data controller.*
6. To withdraw your consent, where consent was sought – *this can be at any time via any of the channels outlined in section 11. Contact Details*
7. To object to the processing of personal data being used for direct marketing or it is being processed via the legitimate interest, or public task lawful basis.
8. To refer a complaint with the Information Commissioners Office ICO.

When exercising any of the rights listed above, in order to process your request, we may need to verify your identity for your security. In such cases we will need you to respond with proof of your identity before you can exercise these rights.

We will do our utmost to respond without undue delay and at the latest within one month of receipt of the request, However, we are able to extend this period by up to 2 months for complex requests or exceptional circumstances, in this event we will communicate to advise before the end of the initial deadline.

A “reasonable fee” will only be applied to cover the administrative costs of complying with manifestly unfounded or excessive requests.

8. International Data Transfers

We may send your information to other countries when:

- we or a company we work with store information on computer servers based overseas; or
- we communicate with you when you are overseas.

We conduct due diligence on the companies we share data with and note whether they process data in the UK, EEA (which means the European Union, Liechtenstein, Norway and Iceland) or outside of the EEA.

The UK and countries in the EEA are obliged to adhere to the requirements of the GDPR and have equivalent legislation which confer the same level of protection to your personal data.

For organisations who process data outside the UK and EEA we will assess the circumstances of how this occurs and ensure there is no undue risk.

Additionally, we will assess if there are adequate legal provisions in place to transfer data outside of the UK.

9. Further processing

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

10. Data Protection Breaches

If you suspect that your or someone else's data has been subject to unauthorised or unlawful processing, accidental loss, destruction or damage, we ask that you please contact us without undue delay. See section 11. *Contact Details* for how to do this.

11. Contact Details

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

Data Protection Officer, The London Diocesan Fund, 36 Causton Street, London SW1P 4AU

Email: GDPR@london.anglican.org Tel: 020 7932 1100.

You can contact the Information Commissioners Office on 0303 123 1113 or via email

<https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.

12. Changes to this notice

We keep this Privacy Notice under regular review and we will place any updates on this web page:

www.london.anglican.org/GDPR. This Notice was updated in October 2023.

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www.london.anglican.org