Privacy Notice
PENICUIK TRINITY COMMUNITY CHURCH
SCOTTISH CHARITY NUMBER SC005838

The Kirk Session of Penicuik Trinity Community Church, Scottish Charity number SC005838, (the 'Congregation') is providing you with this Privacy Notice in order to comply with data protection law and to ensure transparency in the collection and use of your personal data.

Who is collecting the information
Lothian and Borders Presbytery, Scottish Charity Number SC040976, is the Data Controller for the Congregation. Neil Cape is the Data Protection Coordinator for the Congregation (tccsessionclerk@gmail.com or 01968 674276).

Why is this personal data collected and for what reason (Purpose)
This information is used to:

- administer membership records, including the Communion/Supplementary Rolls;
- enable pastoral care;
- enable participation in Congregational activities;
- provide you with information in relation to news, events, and activities within the Congregation or the wider Church of Scotland;
- provide the services of a parish church to the local community;
- fulfill legal obligations;
- further charitable aims, for example through fundraising activities;
- maintain accounts and records (including the processing of Gift Aid applications);
- comply with safeguarding obligations including, the protection of vulnerable groups scheme;
- maintain a directory of contact details;
- further the prevention and detection of crime

What personal data is collected

- Name
- Address
- Telephone number
- Mobile number
- Date of Birth
- Email address
- Bank details (for Gift Aid and fundraising purposes)
- Children's data
- Photographs and videos (where applicable)
- Safeguarding information, including deed of covenant

The Congregation also collects some special category (sensitive) personal data, which may include:

- Role in Church (e.g. office bearer information such as Session Clerk, Treasurer etc.)
- Health information
- Racial or ethnic origin

- Sex life or sexual orientation
- Religious beliefs are collected by implication by being a church member

The information source
The information is collected directly from you. Some data is collected via the Presbytery or the National Offices.

The lawful basis for the processing
The Congregation processes special category (sensitive) data under UK GDPR Article 9(2)(d): *"processing is carried out in the course of its legitimate activities with appropriate safeguards by a foundation, association or any other not-for-profit body with a political, philosophical, religious or trade union aim and on condition that the processing relates solely to the members or to former members of the body or to persons who have regular contact with it in connection with its purposes and that the personal data are not disclosed outside that body without the consent of the data subjects".*

For the other processing activities, the lawful basis are:

- UK GDPR Article 6(1)(c) *"processing is necessary for compliance with a legal obligation to which the controller is subject"*.
- Article 6(1)(f) *"processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child"*.
- Article 6(1)(a) *"the data subject has given consent to the processing of his or her personal data for one or more specific purposes"*. This is specific to safeguarding purposes and Sunday School and other related activities dealing with children. Consent will be sought from parents/guardians for processing a child's personal data.

Who data is shared with
Your personal information will only be shared where this is necessary for the purposes set out above. Information will not be shared with any third party outwith the Church of Scotland without your consent unless the Congregation is obliged or permitted to do so by law.

How long the personal data is held for
The Congregation will keep your personal information for as long as you are a member or adherent, or have regular contact with the Congregation, or for as long as the Congregation is obliged to keep it by law or may need to do so in order to respond to any questions or complaints, or to show that the Congregation treated you fairly. When the information is no longer needed it will be securely destroyed following church procedure. A copy of our retention & disposal schedule is attached to this Notice.

Individuals' rights in relation to this processing
Under data protection laws, individuals have a number of rights in relation to the processing of their personal data. These rights are as follows:

- The right to be informed – this privacy notice meets that right.
- The right of access – this means you have the right to have access or receives copies of personal data held by the organisation
- The right to rectification – this means you have the right to correct incomplete or inaccurate data held about you
- The right to erasure – this means you have the right to have your data deleted from an organisation's records.
- The right to restrict processing – this means you have the right to restrict processing. This right is normally used with other rights, e.g. rectification
- The right to data portability – this means you have the right to request your data in a machine-readable format (e.g. a .csv file) and transfer this to another organisation
- The right to object – this means you have the right to object to how your data is processed
- Rights in relation to automated individual decision making, including profiling – the Church does not carry out this type of processing.

Not all rights apply and it depends on the lawful basis as to what rights do apply. For the processing purposes of this privacy notice the right of erasure, right to data portability and the right to object do not apply. All other rights do apply. If you wish to exercise any of your rights please contact the Data Protection Coordinator for Penicuik Trinity Community Church (Neil Cape, tccsessionclerk@gmail.com or 01968 674276) who will process your request accordingly.

As some of the processing lawful basis is based on consent, it's important to note that you can **withdraw your consent** at any time. To do this please contact Neil Cape, tccsessionclerk@gmail.com or 01968 674276

Complaints to the Church of Scotland
If you are concerned about how your personal data is being used by the Church of Scotland, please contact - in the first instance - the Data Protection Coordinator for Penicuik Trinity Community Church (Neil Cape, tccsessionclerk@gmail.com or 01968 674276) and the Data Protection Officer for the Church of Scotland at Privacy@churchofscotland.org.uk, if required.

Complaints to the Information Commissioner's Office (ICO)
If you are not satisfied with the outcome of your complaint to the Church of Scotland, a referral can be made to the UK regulator of data protection, the Information Commissioner's Office (ICO).

The ICO has guidance on their website: https://ico.org.uk/your-data-matters/raising-concerns/
The ICO can be contacted by email casework@ico.org.uk or by telephone on 0303 123 1113. Alternatively, their postal address is:

Customer Contact
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
SK9 5AF

Further information

If you would like further information in relation to this Privacy Notice please contact the Church of Scotland Data Protection Officer at Privacy@churchofscotland.org.uk.

This Privacy Notice may be updated from time to time to reflect changes in legal requirements or other operational reasons. The latest version will always be available from the Lothian and Borders Presbytery, Scottish Charity Number SC040976. Neil Cape is the Data Protection Coordinator for the Congregation Penicuik Trinity Community Church (tccsessionclerk@gmail.com or 01968 674276).