

REPRESENTATIVE BODY OF THE CHURCH IN WALES

GENERAL PRIVACY NOTICE

WHAT'S INCLUDED IN THIS PRIVACY NOTICE?

The Representative Body of the Church in Wales (the “RB”) is a charitable institution responsible for looking after the assets of the Church in Wales to ensure that resources are available for the benefit of the whole Church. You can find out more information about us at www.churchinwales.org.uk.

This document (our “privacy notice”) sets out information relating to how we use Personal Data relating to individuals we have dealings with, including members of the Governing Body, people who make donations to the Church in Wales, tenants who rent buildings owned by the Church in Wales and users of our website. It also sets out information about what rights individuals have in relation to their Personal Data and various other matters required under data protection law.

In particular, this privacy notice provides information to individuals about how they can object to our use of their Personal Data, how they can withdraw any permissions they have given to us to enable us to process their Personal Data and how they can make a complaint.

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WHO DOES THIS PRIVACY NOTICE APPLY TO?

This privacy notice applies to:

1. Members of the Governing Body;
2. Clergy and Former Clergy (meaning clergy who have previously but no longer minister in the Church in Wales);
3. Office and Post Holders;
4. Tenants;
5. Donors;
6. Individuals who contact us with enquiries or complaints;
7. Users of our website;
8. Individuals who undertake training with the us;
9. Individuals who feature in our newsletters or articles;
10. Individuals who we engage to provide services to us; and
11. Individuals who engage with us on social media.

DATA PROTECTION LAWFUL BASES FOR PROCESSING – SPECIAL NOTE

1. We must always have a Lawful basis for processing Personal Data.
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3. However, certain post or office holders, due to their type of office, appointment, rank and/or status within the Church, are not engaged under a traditional employment contract and an Employer/Employee relationship may not exist.
4. Nevertheless, in such cases, the arrangements for their appointment to their role within the Church will be deemed to be a Contract for the purposes of determining the lawful basis for processing their Personal Data under the Data Protection Act 2018 and (UK)GDPR.
5. A non-exhaustive list of such arrangements includes:
 - i. Stipendiary and Non Stipendiary Clerics
 - ii. Other Ministry licensed or commissioned by a Bishop (e.g LLMs)
 - iii. Voluntary service within the Church
 - iv. A range of other posts and offices
6. The authority for this action is pursuant to Welsh Church Act 1914 and the Constitution of the Church in Wales to facilitate the operational activity of the Church.

WHAT'S OUR APPROACH TO PRIVACY?

We take your privacy extremely seriously and want you to feel confident that your Personal Data is safe in our hands.

We will only use your Personal Data in accordance with data protection law prevailing in the UK at the relevant time.

Under data protection law, when we use your Personal Data, we will be acting as a data controller. Essentially, this means that we will be making decisions about how we want to use your Personal Data and why.

Below, we summarise the main rules that apply to us under data protection law when we use your Personal Data:

1.	<p>We must be upfront about how we intend to use your Personal Data and must use your Personal Data in accordance with the prescribed data protection principles. These principles are shown below:</p> <p>We are responsible for ensuring that personal data under our control is processed in accordance with the data protection principles which require data is processed:</p> <ol style="list-style-type: none">1. Fairly and lawfully2. Processed for limited purposes3. Adequate, relevant and not excessive4. Accurate and Secure;5. Not kept longer than necessary6. Processed in accordance with your rights7. Not transferred to countries outside the UK without safeguards.8. In a manner that ensures appropriate security of the personal data. <p>Providing privacy information to individuals (such as this privacy notice) is one aspect of helps us to fulfil this obligation.</p>
2.	<p>We must only use your Personal Data if one of the legal grounds set out in data protection law apply. These legal grounds are:</p> <ol style="list-style-type: none">1. You have consented to our use of your Personal Data;2. We need to use your Personal Data to perform a contract between us;3. We need to use your Personal Data to comply with the law.4. The processing is necessary in order to protect the vital interests of you or of another natural person.5. The processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.6. We (or someone else) has a legitimate reason for needing to use your Personal Data and it would not be unfair to you if your Personal Data was used for this purpose. This is known as having a

	<p>“legitimate interest” and we must weigh up your rights and our interests before we can rely upon this basis;</p>
3.	<p>We must only use certain types of Special Category Personal Data (such as information relating to a person’s health, racial origin or religion) if we can also satisfy one of the conditions set out in data protection law. These conditions are:</p> <ul style="list-style-type: none"> • You have given us your explicit consent to use the information; • We need to use the information in the course of the legitimate activities of the Church in Wales and the information is not being disclosed outside the Church in Wales; • We need to use the Personal Data in relation to your employment. • You have already made the information public; • We need to use the information to protect your vital interests or the vital interests of another person; • We need to use the information for archiving purposes • Where there is substantial public interest • For the purposes of occupational medicine or public health issues. • We need to use the information in connection with a legal claim.
4.	<p>We must only share your Personal Data with others if we have a legal ground for doing so (see point 2 above) and/or (in relation to Special Category Personal Data) we can satisfy a condition (see point 3 above).</p>
5.	<p>Generally speaking, we must only use your Personal Data for the specific purposes we have told you about. If we want to use your Personal Data for other purposes, we need to contact you again to tell you about this.</p>
6.	<p>We must not hold more Personal Data than we need for the purposes we have told you about and must not retain your Personal Data for longer than is necessary for that purpose (known as the “retention period”). We must also dispose of any information that we no longer need securely.</p>
7.	<p>We must ensure that we have appropriate security measures in place to protect your Personal Data.</p>
8.	<p>We must act in accordance with your rights under data protection law (more information about your rights can be found on our website at www.churchinwales.org.uk)</p>
9.	<p>We must not transfer your Personal Data outside of the UK without safeguards being in place such as an ‘Adequacy Agreement’ exists between the UK and that Country.</p>

HOW WILL WE USE YOUR PERSONAL DATA?

How we will use your Personal Data, the legal bases we will rely upon, how long we will keep your Personal Data and other details will depend upon who you are and why we need your Personal Data in the first place.

In this section, we provide specific privacy information relating to the different categories of individuals that this privacy notice applies to.

MEMBERS OF THE GOVERNING BODY

Personal Data	Lawful Base(s)	Retention Period	Source of Data Use of Data & Data Sharing	Consequences of not Providing Your Data
<p>Your name;</p> <p>Your contact details (such as your postal address, telephone number and/or email address);</p> <p>Your Date of Birth;</p> <p>Your Bank Account Details;</p> <p>Your connection with the Church in Wales (which will reveal your religious beliefs).</p>	<p>Public Task</p> <p>Use of your Personal Data to provide you with relevant papers and documents and to share with other members of the Governing Body is to ensure the proper operation of the Church.</p> <p>Special Category Data</p> <p>If and to the extent this reveals your religious beliefs, our processing of that Special Category data is carried out with your explicit consent, which is obtained during the application and appointment process of becoming a Governing Body Member.</p> <p>Archiving</p> <p>Keeping a record of your name and the dates you</p>	<p>Your contact details will be retained for the duration of your membership of the Governing Body and Seven years thereafter.</p> <p>Your name and your period of office as a member of the Governing Body of the Church in Wales will be retained indefinitely for historical research purposes.</p>	<p>Your Personal Data is provided to us by the relevant Diocese.</p> <p>Personal Data is shared with our authorised staff and Data Processors.</p> <p>We will share your contact details with other members of the Governing Body to enable members to contact each other to discuss Church in Wales business.</p> <p>Names of Governing Body Members are listed on our website.</p> <p>Names and periods of office will be shared with interested parties only for historical</p>	<p>If your name and contact details are not provided you will be unable to act as a member of the Governing Body as we will not be able to provide you with the information relevant to your role.</p>

	were a member of the Governing Body of the Church in Wales is necessary for historical research purposes and is in the public interest.		research purposes.	
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Circumstances in which we will send your Personal Data outside the UK

On occasion there will be an opportunity to visit other Churches overseas within the Anglican Communion. In such circumstances, we will need to send some of your Personal Data to the overseas Church in order to arrange your visit.

We will only transfer your Personal Data in such circumstances where we have your explicit consent to do so.

CLERGY AND FORMER CLERGY

Personal Data	Lawful Base(s)	Retention Period	Source of Data Use of Data & Data Sharing	Consequences of not Providing Your Data
Your name; Your contact details (such as your postal address, telephone number and/or email address); Your Date of Birth; Your National Insurance number and tax code Your bank details, payroll details and tax status information Your salary, honorarium, pension and	Public Task We will use your name and contact details to correspond with you in relation to Church in Wales relevant business; We will use your National Insurance number, tax code, bank details, payroll details and tax status information to pay you any salary or honorarium and for benefit and pension purposes; We will use your Personal Data to deal with any disciplinary and/or grievance issues which may arise relating to you or in respect of which you may be able to provide relevant information;	We will keep your Personal Data for as long as you are engaged by us and for a period of up to 70 years after your death. The reasons for keeping your personal data for this length of time include to comply with HMRC requirements and because some claims can be brought up to 6 years after your engagement ends.	His Majesty's Revenue and Customs (HMRC) in connection with your pay and benefits Banks and other financial institutions in connection with your pay and benefits Pensions providers and administrators (and related third parties who provide administrative, actuarial and clerical support to those providers	Failure to provide personal contact details, tax details, bank details, pension and benefit details will prevent us from being able to engage with you for your Ordination or other religious matters, pay you and/or provide you with benefits.

<p>benefits details</p> <p>Your Bank Account Details;</p> <p>Your Date of Ordination;</p> <p>Information relevant to the provision of a house for duty;</p> <p>Details of any disciplinary matter;</p> <p>Health information;</p> <p>Any other information recorded on the Infonet;</p> <p>Your connection with the Church in Wales (which will reveal your religious beliefs);</p> <p>Information about criminal convictions.</p>	<p>We will use your Personal Data to assist the Bishop with making and managing your appointment;</p> <p>We will use your Personal Data to provide you with a house for duty and for administrative purposes in relation to such house;</p> <p>We will collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so.</p> <p>Legal Obligation</p> <p>We carry out DBS checks on behalf of other parts of the Church in Wales, such as on behalf of the Bishops or Diocese. The information obtained will be used by us in conjunction with other parts of the Church in Wales to determine whether to engage you.</p> <p>This is because the Church in Wales has a Legal Obligation to take all reasonable precautions to ensure that the Church is a safe place for all.</p> <p>We will only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary for reasons of substantial public</p>	<p>For these purposes you remain engaged by the us if you are a member of a Church in Wales pension scheme.</p> <p>DBS disclosure results will ordinarily be destroyed within six months of receipt.</p> <p>Your personal file will contain a pro-forma that will indicate the date of receipt of the DBS disclosure information and whether results were acceptable.</p> <p>In the event that the disclosure result highlights concerns relating (in the view of our Safeguarding Manager) to safeguarding of children and/or adults at risk, a record of the disclosure results will</p>	<p>and administrator s) for providing and administering your pension</p> <p>Payroll provider to enable us to pay you</p> <p>The results of DBS checks carried out on behalf of other parts of the Church in Wales will be shared with those parts of the Church in Wales.</p> <p>The Archbishops' Council (of the Church of England) so that details of the office/position that you hold can be included in the Crockford database and in the Crockford's Clerical Directory.</p> <p>Further biographical information and contact details will only be included with your consent.</p>	
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	<p>interest, namely, safeguarding, preventing or detecting unlawful acts, protecting the public against dishonesty, preventing fraud or suspicion of terrorism or money laundering.</p> <p>DBS Checks are part of an automated decision making process pursuant to Article 22 UK GDPR. The information provided by the DBA service is used to assess suitability for employment or appointment to a post.</p> <p>Special Category Data</p> <p>If and to the extent this reveals your religious beliefs, our processing of that Special Category data is carried out on the grounds that you have made this personal data public by virtue of your ordination.</p> <p>Archiving</p> <p>Keeping a record of your name and the dates you were a member of the Clergy in the Church in Wales is necessary for historical research purposes and is in the public interest.</p>	<p>be retained securely by our Safeguarding Team indefinitely.</p> <p>Information on your clergy personal file pertaining to your ministry is kept until 70 years after your death for your assistance, to comply with the Church's safeguarding requirements , and for historical purposes.</p> <p>Our policy in respect of Clergy personal files, including a retention schedule policy, is available separately on our website.</p>		
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Circumstances in which we will send your Personal Data outside the UK

On occasion there will be an opportunity to visit other Churches overseas within the Anglican Communion. In such circumstances, we will need to send some of your Personal Data to the overseas Church in order to arrange your visit.

We will only transfer your Personal Data in such circumstances where we have your explicit consent to do so.

OFFICE HOLDERS AND POST-HOLDERS

Personal Data	Lawful Base(s)	Retention Period	Source of Data Use of Data & Data Sharing	Consequences of not Providing Your Data
<p>Your name;</p> <p>Your contact details (such as your postal address, telephone number and/or email address);</p> <p>Your Bank Account details (if in a paid post);</p> <p>Your connection with the Church in Wales (which will reveal your religious beliefs);</p>	<p>Public Task</p> <p>Use of your Personal Data for administrative purposes, to provide you with relevant papers and documents and to share with other members of various committees is part of the proper running of the Church in Wales.</p> <p>Listing your name on the provincial website as an office/post holder will be done pursuant to your role.</p> <p>Special Category Data</p> <p>If and to the extent processing your Personal data reveals your religious beliefs, our processing of that information will be carried out because you have manifestly made the information public in accepting the role within the Church in Wales.</p>	<p>Your contact details will be retained for the duration of your office and for 7 years thereafter.</p> <p>Your name and your period of office will be retained indefinitely for historical research purposes.</p> <p>DBS disclosure results will ordinarily be destroyed within six months of receipt.</p> <p>In the event that the disclosure result highlights concerns relating (in the view of our Safeguarding Manager) to safeguarding</p>	<p>Your personal data will be provided to us either by you directly or by the relevant Diocese and or Bishop.</p> <p>We will share your contact details with other members of the committee or body you are an office holder of to enable members to contact each other to discuss Church in Wales business.</p> <p>We will record your name and the fact that you were an Office/Post Holder of the Church in Wales and the dates of your period of office for historical</p>	<p>If your name and contact details are not provided you will be unable to be appointed as an office holder as we will not be able to provide you with information relevant to your office.</p>

	<p>Where DBS Checks are conducted they are part of an automated decision making process pursuant to Article 22 UK GDPR.</p> <p>The information provided by the DBS service is used to assess suitability for appointment to a post.</p> <p>Legal Obligation</p> <p>We will only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary for reasons of substantial public interest, namely, safeguarding, preventing or detecting unlawful acts, protecting the public against dishonesty, preventing fraud or suspicion of terrorism or money laundering.</p> <p>This is because the Church in Wales has a Legal Obligation to take all reasonable precautions to ensure that the Church is a safe place for all</p> <p>Archiving</p> <p>Keeping a record of your name and the dates you held an office or post in the</p>	<p>of children and/or adults at risk, a record of the disclosure results will be retained securely by our Safeguarding Team indefinitely.</p>	<p>research purposes.</p> <p>We will use your bank account details to pay you any expenses due;</p> <p>We will use your Personal Data to provide you with information relevant to your office, such as meeting papers and issues for discussion at committee meetings.</p> <p>We will collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so.</p> <p>We carry out DBS checks on behalf of other parts of the Church in Wales, such as on behalf of the Bishops or Diocese.</p> <p>The information obtained will be used by us in conjunction</p>	
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	Church in Wales is necessary for historical research purposes and is in the public interest.		with other parts of the Church in Wales to determine whether to engage you. Information about criminal convictions will be obtained from the Disclosure and Barring Service (“DBS”) if you have agreed to undertake a DBS check through the Church in Wales.	
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TENANTS OF OUR BUILDINGS AND ANY GUARANTORS

Personal Data	Lawful Base(s)	Retention Period	Source of Data Use of Data & Data Sharing	Consequences of not Providing Your Data
Tenant and/or guarantor name; Tenant and/or guarantor contact details (such as postal address, telephone number and/or email address, together with alternative contact details for deposit scheme);	Contract The use of the tenant’s Personal Data to enter into a tenancy agreement; for correspondence in relation to the tenancy and associated matters; to collect payment and return any deposit paid will be necessary for the purposes of taking steps prior to entering into a contract with the tenant and for the	Your Personal Data will be retained for the duration of the tenancy agreement and for 15 years thereafter due to the limitation period on property disputes.	Your personal data will be provided to us by the tenant and/or guarantor, or from the agent advertising the tenancy, arranging the tenancy or managing the tenancy, referees and credit reference agencies. We use this information to assess reliability as a tenant or guarantor and the ability to pay the rent;	Failure to provide us with your Personal Data as requested will mean that we cannot enter into a tenancy agreement with the tenant.

<p>Tenant and/or guarantor Bank Account Details;</p> <p>Information provided from referees/previous landlords of tenant; Information from credit reference agencies;</p> <p>Tenant and/or guarantor salary details;</p>	<p>performance of the contract between us.</p> <p>The use of the tenant's and/or guarantor's Personal Data to assess reliability and ability to pay the rent will be necessary for the purposes of taking steps prior to entering into a contract with the tenant and for the performance of the contract between us.</p> <p>Credit Checks are part of an automated decision making and profiling process pursuant to Article 22 UK GDPR.</p> <p>The information provided by the Credit Agency is used to assess the suitability of Tenants and /or their Guarantors ad to ensure as far as possible that they have the means to make rent payments.</p> <p>Legal Obligation</p> <p>We may be required to report details of our Tenants to HMRC or other statutory bodies.</p>		<p>to enter into a tenancy agreement; to correspond with the tenant and/or guarantor in relation to the tenancy and associated matters; for tenancy administrative purposes; to obtain rent and deposit payment from tenant and/or guarantor and to return any deposit payment.</p> <p>We will share your name and address with: credit reference agency and with referees you notify us of in order to assess your ability to pay the rent and your reliability as a tenant or guarantor; our tenancy managing agents for property management and maintenance purposes; people and organisations we use to carry out repairs and maintenance.</p>	
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DONORS

Personal Data	Lawful Base(s)	Retention Period	Source of Data Use of Data & Data Sharing	Consequences of not Providing Your Data
<p>Your name;</p> <p>Your contact details (such as your postal address, telephone number and/or email address);</p> <p>Your Bank Account Details;</p> <p>Whether you are a UK taxpayer;</p> <p>Your connection with the Church in Wales (which may reveal your religious beliefs).</p>	<p>Contract</p> <p>Processing your data will be necessary for the purposes of entering into a contract and for the performance of the contract between us.</p> <p>Legal Obligation</p> <p>We will report details of donors to HMRC as necessary to obtain tax reimbursements.</p> <p>Donations allow the Church in Wales to further the interests of the Church in Wales and its aims. If and to the extent that your donation to the Church in Wales reveals your religious beliefs, our processing of that Special Category Personal Data is conducted with your explicit Consent.</p>	<p>Your Personal Data including your contact details will be retained for the duration of the giving and for Seven years thereafter.</p>	<p>Your Personal Data is provided either directly from the donor or from the relevant Diocese/Parish.</p> <p>We will use the Personal Data in order to process your donation (whether a one off or a regular donation) and to obtain any tax reimbursements through gift aid.</p> <p>We will share your name, amount of your donation and whether tax is reclaimed with the Parish treasurer for parish accounting and records purposes. We will share your Personal Data with HMRC in order to obtain any gift aid tax reimbursement, where applicable.</p>	<p>Failure to provide us with your name address and bank account details will mean we cannot process any donation other than a cash or cheque donation.</p>

INDIVIDUALS WHO CONTACT US WITH ENQUIRIES/COMPLAINTS

Personal Data	Lawful Base(s)	Retention Period	Source of Data Use of Data & Data Sharing	Consequences of not Providing Your Data
<p>Your name;</p> <p>Your contact details (such as your telephone</p>	<p>Consent</p> <p>Use of your Personal Data for the purpose dealing with your enquiry or complaint</p>	<p>Records of your enquiry or complaint are retained until 12 months after</p>	<p>Your Personal Data is provided by you</p>	<p>Failure to provide us with your details will mean that we cannot</p>

<p>number or email address);</p> <p>Details of your enquiry;</p> <p>Your connection with the Church in Wales (which may reveal your religious beliefs), if relevant.</p>	<p>is based on your Consent.</p> <p>Keeping a record of your enquiry or complaint in order to deal with it, is based on your Consent.</p> <p>Special Category Data</p> <p>Where the details of your enquiry reveal your religious belief because of your connection with or contact with the Church in Wales, our processing of that Special Category Personal Data will be carried out with your explicit Consent.</p> <p>Legal Obligation</p> <p>Where the matter involves safeguarding issues or allegations relating (in the view of our Safeguarding Manager) to safeguarding of children and/or adults at risk, the complaint will be dealt with under the lawful basis of Legal Obligation.</p> <p>This is because the Church in Wales has a Legal Obligation to take all reasonable precautions to ensure that the Church is a safe place for all.</p>	<p>the matter is resolved or your Consent is withdraw, which ever comes first.</p> <p>Where the matter involves safeguarding issues or allegations relating (in the view of our Safeguarding Manager) to safeguarding of children and/or adults at risk, a record of the complaint will be retained securely by our Safeguarding Team indefinitely.</p>	<p>when you contact us. (e.g. by making a phone call or emailing us).</p> <p>We will use the Personal Data to deal with your enquiry or complaint;</p> <p>We will make a record of your enquiry /complaint for internal admin purposes.</p>	<p>contact you to deal with your enquiry.</p> <p>In certain limited circumstance s we may be able to deal with allegations of misconduct amounting to safeguarding issues anonymously.</p>
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INDIVIDUALS WHO UNDERTAKE TRAINING WITH US

Personal Data	Lawful Base(s)	Retention Period	Source of Data Use of Data & Data Sharing	Consequences of not Providing Your Data
<p>Your name;</p> <p>Your contact details including, email address and (if a member of the Church in Wales) details of your parish/Diocese.</p> <p>For online training, we may collect technical information, including the internet protocol address used to connect your computer to the internet;</p> <p>the browser type and version; time zone settings;</p> <p>browser plug-in types and versions, operating system and platform;</p> <p>For online training, we may collect information about your visit, including the Uniform Resource Locators (“URL”); clickstream to, through and</p>	<p>Public Task</p> <p>There is a duty upon Ordained clergy and LLMs to ensure they attend ongoing training throughout their Ministry, Personal Data in relation to these matters is processed as part of the proper running and organisation of the Church in Wales.</p> <p>Contract</p> <p>Where a Contract exists for the provision of training services, processing your data will be necessary for the purposes of entering into a contract and for the performance of the contract between us.</p> <p>Legal Obligation</p> <p>Our collection and use of your Personal Data is based on our legal obligation in holding a record of who within our organisation has been trained to what level and on what dates.</p>	<p>We keep records of all completed training for a period of six years from the date of completion.</p> <p>This is so that refresher or updated training can be offered to the appropriate persons at the appropriate time.</p> <p>Certain training information will be contained in Clergy files and retention periods are dealt with in our Clergy Files Policy available on our Website.</p>	<p>Some of the information is collected by us each time you use our website through our use of cookies. Further information about the cookies we use and the purposes for which we use them can be found in our Cookies Policy www.churchinwales.org.uk/cookies/</p> <p>Some of the information is entered by you into our registration and sign-up forms or entered by us on your request (if asking to be registered on a course).</p> <p>The information you provide is used by us to arrange our training programme and to ensure that training delivery is to the highest possible</p>	<p>If you disable our Cookies, you will be unable to use certain parts of/functions on our website.</p> <p>If you do not provide us with the Personal Data requested in the training sign-up you will be unable to participate in our training resources, whether online or in person.</p> <p>Some roles within the Church in Wales require completion of specified training, so not providing us with this information maybe you are unable to take up or continue in a particular role within the organisation.</p>

<p>from our website (including date and time), page response times, download errors;</p> <p>length of visit to certain pages and methods used to browse away from the page.</p> <p>Your attendance record of courses (whether online or in person), dates of completion and marks of any assessments.</p>	<p>Special Category Data</p> <p>Where the Personal Data processed reveal your religious belief because of your connection with or contact with the Church in Wales, our processing of that Special Category Personal Data will be carried out with your explicit Consent.</p>		<p>standards. It is also used to maintain and accurate of record of who has been training, to what level, on what dates.</p> <p>Training courses may be arranged and booked by the relevant Diocese.</p>	
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INDIVIDUALS WHO FEATURE IN OUR NEWSLETTERS OR ARTICLES

Personal Data	Lawful Base(s)	Retention Period	Source of Data Use of Data & Data Sharing	Consequences of not Providing Your Data
<p>Your name;</p> <p>Your geographical location;</p> <p>Your association with the Church in Wales, which is likely to reveal your religious beliefs;</p> <p>Any other personal details you provide to us as part of your story.</p>	<p>Consent</p> <p>Use of your Personal Data for the purpose of writing the newsletter or article is based on your Consent.</p> <p>Special Category Data</p> <p>Once the Newsletter is printed and disseminated it may indicate your Religious beliefs and affiliation to the Church. The legal ground for processing this</p>	<p>Unless you withdraw your consent prior to printing, articles and newsletters remain available on our website indefinitely, in the archived section for reference purposes and for disseminating information about the Church in Wales to the public.</p>	<p>Your Personal Data is provided by you when you agree to feature in a newsletter or article.</p> <p>We will use the Personal Data provided within the article or newsletter; the article or newsletter will be posted on our website and/or will be printed in our Highlights magazine or</p>	<p>Failure to provide us with your details will mean that we cannot contact you to deal with your enquiry.</p> <p>In certain limited circumstances we may be able to deal with allegations of misconduct amounting to safeguarding issues anonymously.</p>

	<p>Special Category Personal Data is that the information is manifestly made public by your original consent to publication.</p> <p>Archiving</p> <p>Newsletters are a valuable source of historical information and as such once published are retained indefinitely in the public interest for historical research purposes.</p>		other in house publications.	
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INDIVIDUALS WHO WE ENGAGE TO PROVIDE SERVICES TO US

Personal Data	Lawful Base(s)	Retention Period	Source of Data Use of Data & Data Sharing	Consequences of not Providing Your Data
<p>Your name and contact details;</p> <p>Your bank account details.</p>	<p>Contract</p> <p>We will use your Personal Data to enter into an agreement for services with you; for correspondence in relation to the services and associated matters and to make payment for the service(s) provided.</p> <p>The Personal Data will be necessary for the purposes of taking steps prior to entering into a contract with you and for the performance of the contract between us.</p>	<p>We will retain your Personal Data for the duration of the provision of services and for six years thereafter in case there should be any contractual dispute.</p>	<p>Your Personal Data is provided by you when you agree to provide us with services.</p> <p>We will use the Personal Data to enter into an agreement with you, to contact you, to administer the agreement for services and to pay you.</p>	<p>Failure to provide us with your Personal Data will mean that we will not be able to engage you to provide us with services nor will we be able to pay you.</p>

	<p>Special Category Data</p> <p>The contract between us may indicate your Religious beliefs and affiliation to the Church. The legal ground for processing this Special Category Personal Data is your explicit consent to entering contractual relations.</p>			
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ENGAGING WITH US ON SOCIAL MEDIA

Any social media posts or comments you send to us (on the Church in Wales Facebook page, for instance) will be shared under the terms of the relevant social media platform (e.g. Facebook or Twitter) on which they're written and could be made public.

The Social Media Companies, not us, control these platforms. We are not responsible for this kind of sharing. So, before you make any remarks or observations about anything, you should review the terms and conditions and privacy policies of the social media platforms you use.

In that way, you'll understand how they will use your information, what information relating to you they will place in the public domain, and how you can stop them from doing so if you're unhappy about it.

AUTOMATED DECISION-MAKING AND PROFILING

Automated decision-making takes place when an electronic system uses Personal Data to make a decision without human intervention and a legal decision or similarly important decision is made based on the information.

We will only use automated decision making about you in very limited circumstances and when there is a legal basis for our activities. E.g. searching credit records or advising a credit reference agency of defaults in payments or conducting pre employment DBS checks.

WHEN WE WILL SHARE YOUR PERSONAL DATA WITH OTHERS

Sometimes, we will need to share your Personal Data with others. This section sets out details of who we will share your Personal Data with and why. It also tells you about our legal grounds for doing so under data protection law and steps we will take to protect your Personal Data.

Please note that we will never sell your Personal Data on to third parties.

SERVICE PARTNERS

Information about our service partners	<p>Our service partners are other businesses that we enter into contracts with. They include:</p> <p>Suppliers and sub-contractors;</p> <p>Suppliers of IT products and services;</p> <p>We haven't included the names of our service partners in this privacy notice because we will deal with different service providers from time to time.</p> <p>However, if you would like further information about any of our current service providers, please contact us on 029 2034 8200</p>
Why we need to share your Personal Data	<p>We use suppliers and sub-contractors to perform certain aspects of our contracts with our tenants. For example, providing maintenance services;</p> <p>We use suppliers of IT products and services in connection with the supply, maintenance and/or improvement of our IT network.</p>
The legal grounds we rely upon	<p>The sharing of your personal data with suppliers and sub-contractors is necessary for the performance of our Contract with them;</p> <p>The sharing of your personal data with businesses used by us in connection with the supply, maintenance and/or improvement of our IT network is based on Contracts we hold with the supplier and Data Processing Agreements which allow us to provide them with any of your Personal Data Under our control.</p>

OTHER PARTS OF THE CHURCH IN WALES

Information about the different parts of the Church in Wales	<p>Information about the structure of the Church in Wales can be found at www.churchinwales.org.uk .</p>
Why we need to share your Personal Data	<p>where it is necessary in the course of the work and activities of the Church in Wales, for example:</p> <p>sharing details of a complaint with the applicable Parish or Diocese;</p> <p>sharing details about donations received being shared with the applicable Parish or Diocese;</p> <p>sharing details of disciplinary issues relating to clergy with the applicable Bishop.</p>
The legal grounds we rely upon	<p>We will share Personal data with other parts of the Church in Wales when:</p> <p>We have a legal Obligation to do so.</p>

	<p>It is necessary for the performance of a Contract</p> <p>It is carried out in the course of the proper running and management of the Church in Wales under the lawful basis of Public Task.</p> <p>Where the other part of the Church in Wales is a legal entity in its own right and our data sharing with them is not based on the proper running of the Church under Public Task then we will share details with them based on their data protection compliance and our Data Controller/Processor agreements with them as applicable</p>
What precautions do we take?	<p>Personal data is only shared within the Church in Wales where this can be done fairly and lawfully, in accordance with the data protection principles and data protection laws.</p> <p>To this end the Church in Wales aims to ensure;</p> <p>that only personal data that needs to be shared in connection with the operations and activities of the Church is shared;</p> <p>that personal data is only shared when it is necessary and appropriate to do so;</p> <p>that personal data is shared on a 'need to know' basis and is not shared more widely than is necessary; and</p> <p>that personal data is shared securely.</p>

OTHER THIRD PARTIES

In addition to the situations described above, we may also need to share your Personal Data with third parties in the following circumstances:

Legal or regulatory requirements	<p>On occasion, we may be required to disclose your Personal Data to organisations such as regulatory bodies, the courts and the police to comply with legal obligations we are subject to and/or to prevent fraud or crime.</p> <p>Also to other organisations such as the courts, the police, regulatory bodies, credit reference agencies and/or debt collection and tracing agents;</p>
Protecting our interests	<p>We may need to disclose your Personal Data in connection with steps we need to take to protect our interests or property. For example, if a tenant defaults with payment, we may disclose your Personal Data to credit reference agencies or debt collection or tracing agents.</p> <p>The lawful basis of this activity is that it is necessary for the performance of a contract and is an exception to the general rule against automatic decision making under Article 22(2)a of the UK GDPR</p>

<p>Professional advice and legal action</p>	<p>We may need to disclose your Personal Data to our professional advisers (for example, our lawyers and accountants) in connection with the provision by them of professional advice.</p>
<p>Use of Proprietary Software and Online Services.</p> <p>Eg. Survey Monkey, Mailchimp or similar services.</p>	<p>From time to time we may use proprietary software/Services for operational purposes to assist in future planning for Church activities. Such software may be used to gather opinions for the assessment of future proposals; to manage our response to developing technology; evaluate the viewpoint of individuals both within the Church and with the Public to various proposals related to Church matters.</p> <p>The software/service used may generate electronic surveys to be distributed to interested parties under the lawful basis of Public Task. This type of software/service will not be used as marketing activity on behalf of the RB. There is no commercial element to their use, so they do not activate the restrictions on marketing pursuant to the Privacy & Electronic Communications Regs 2003.</p> <p>The communications in these cases may be sent via email/post or text messaging. The retention of this data is likely to be relatively short lived. Generally, the data collected, once evaluated will be kept for no longer than 12 months.</p>
<p>Use of Legitimate Interests</p> <p>When do we apply the Lawful basis of Legitimate Interest?</p>	<p>We use the Lawful Base of Legitimate interest sparingly and only when no other basis exists for processing the Personal Data in question.</p> <p>There are two occasions which we have identified the use of Legitimate Interests to be necessary.</p> <p>The first is the use of CCTV camera equipment. The second is the use of Video Conferencing. We have conducted Legitimate Interest Assessments for each of the two activities and they showed that the processing was necessary and in the Legitimate Interests of the Church</p> <p>The Legitimate Interest Assessments are reproduced in full in our hard copy documents which are available if required.</p> <p>CCTV: To protect our premises. To protect the safety of our employees and visitors to the premises. To assist lawful authorities in the prevention and detection of crime.</p> <p>Video Conferencing:</p> <p>To facilitate efficient business video & telecommunications. To protect the safety of our employees and participants on the call from unnecessary real world travelling.</p> <p>To support the primary objectives of Representative body of the Church in Wales.</p>

CIRCUMSTANCES IN WHICH WE WILL SEND YOUR PERSONAL DATA OUTSIDE THE UK

Due to the operation of the Internet and other computer based applications, Personal Data under our control may transit countries outside of the UK but other than the specific situations identified in the various sections above, we will only transfer data outside the UK if adequate safeguards are in place in the destination country.

HOW DO WE KEEP YOUR PERSONAL DATA SECURE?

We take various steps to protect your Personal Data while it is in our possession, including:

- Implementation of appropriate security measures to protect our IT infrastructure;
- Implementation of internal data security policies and training for members of staff in relation to such policies.

WHAT RIGHTS DO YOU HAVE UNDER DATA PROTECTION LAW?

Under data protection law, you have a number of different rights relating to the use of your Personal Data. The table below contains a summary of those rights and our obligations. More information about your rights and our obligations can be found on the ICO website <https://ico.org.uk/>.

Your rights	What this involves	What our obligations are
A right of access	This is a right to obtain access to your personal data and various supplementary information.	We must provide you with a copy or your Personal Data and the other supplementary information without undue delay and in any event within one month of receipt of your request; We cannot charge you for doing so save in specific circumstances (such as where you request further copies of your Personal Data).
A right to have personal data rectified	This is a right to have your Personal Data rectified if it is inaccurate or incomplete.	We must rectify any inaccurate or incomplete information without undue delay and in any event within 1 month of receipt of your request; If we have disclosed your Personal Data to others, we must (subject to certain exceptions) contact the recipients to inform them, that your Personal Data requires rectification.
A right to erasure	This is a right to have your Personal Data deleted or removed. This right only applies in certain circumstances (such as where we no longer need the Personal	If this right applies, we must delete or remove your Personal Data without undue delay and in any event within 1 month of receipt of your request; If we have disclosed your Personal Data to others, we must (subject to

	<p>Data for the purposes for which it was collected).</p> <p>We have the right to refuse to delete or remove your personal data in certain circumstances.</p>	<p>certain exceptions) contact then recipients to inform them that your Personal Data must be erased.</p>
A right to data portability	<p>This is a right to obtain and re-use your Personal Data for your own purposes; It includes a right to ask that your Personal Data is transferred to another organisation (where technically feasible).</p> <p>This right only applies in certain limited circumstances.</p> <p>Following a request relating to Data Portability we will transmit the relevant personal data to the data subject or their nominated data controller where it is possible and technically feasible for us to do so.</p>	<p>If this right applies we must provide your Personal Data to you in a structured, commonly used and machine readable form</p> <p>Again, we must act without undue delay and in any event within 1 month of receipt of your request;</p> <p>We cannot charge you for this service.</p>
A right to object	<p>This is a right to object to the use of your Personal Data. The right applies in certain specific circumstances only.</p> <p>You can use this right to challenge our use of your Personal Data based on our legitimate interests;</p> <p>You can also use this right to object to use of your Personal Data for direct marketing</p>	<p>If you object to us using your Personal Data for direct marketing, we must stop using your Personal Data in this way as soon as we receive your request.</p> <p>If you object to other uses of your Personal Data, whether we have to stop using your Personal Data will depend on the particular circumstances.</p>
A right to object to automated decision making	<p>This is a right not to be subject to a decision which is made solely on the basis of automated processing of your Personal Data where the decision in question will</p>	<p>Where such a decision is made, you must be informed of that fact as soon as reasonably practicable;</p> <p>You then have 21 days from receipt of the notification to request that the decision is reconsidered or that a</p>

If you wish to exercise any of your rights, you can make a request by contacting us on 029 2034 8200 or writing to us at dataprotection@churchinwales.org.uk

If you request the exercise of any of your rights we are entitled to ask you to provide us with any information that may be necessary to confirm your identity.

YOUR RIGHT TO WITHDRAW CONSENT

If you have given us your consent to process your Personal Data, you can withdraw your consent at any time. To do so, please contact us dataprotection@churchinwales.org.uk

HOW CAN YOU GET IN TOUCH WITH US AND WHO OVERSEES OUR COMPLIANCE WITH DATA PROTECTION LAW?

You can get in touch with us in the following ways:

Postal address	4 th Floor 2 Callaghan Square Cardiff CF10 5BT
Email address	dataprotection@churchinwales.org.uk
Phone number	02920348200

We have appointed a Data Protection Officer (DPO) to oversee our compliance with data protection law and this privacy notice. He may be contacted via the details set out above. If you have any questions about this privacy notice, how we handle your Personal Data or if you wish to make a complaint, please contact dataprotection@churchinwales.org.uk

RIGHT TO COMPLAIN TO THE INFORMATION COMMISSIONER'S OFFICER

If we are unable to deal with a complaint to your satisfaction or if you are unhappy with the way we are using your personal data, you also have the right to make a complaint at any time to the UK's supervisory authority for data protection issues, the Information Commissioner's Office.

CHANGES TO OUR PRIVACY NOTICE

There may be developments in how we use your data according to changes in the Law.

We reserve the right to make changes to this Data Protection and Privacy Policy at any time without notice and it is your responsibility to revisit this page from time to time to re-read this policy including any and each time you visit our website.

Any revised terms shall take effect as at the date of posting.

If you don't find your concern addressed here, feel free to contact us using the contact details provided above.

JUNE 2023