



Chaseteam Malvern

All Saints – St Andrew's – St Mary's

Partnering with God in the flourishing of our communities

St Andrew's is Registered Charity No 1128973. All Saints and St Mary's are Exempted Charities.

Data Privacy Notice v6

March 2025

Introduction and Background

Your privacy is important to us, and we want to hold and use your personal data only in a way which is appropriate to your involvement with our churches and which is in line with UK law on data protection and the requirements of the Diocese of Worcester and the Church of England. This Privacy Notice is provided to explain what to expect when we collect and process your personal information in accordance with the UK law.

1. Your personal data – what is it?

Personal data relates to an 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").

Every member of our churches is deemed to be a "data subject", irrespective of age. The data subject is determined to be the member of the churches rather than the parent/guardian of that member. However, we will also be holding some measure of personal data for the parent/guardian (e.g. name and contact details) even if they are not a church member. We undertake to hold this data in the same secure manner and use this data only in the same manner as outlined within this document.

2. Who are we?

We are:

- The Parochial Church Council of the Ecclesiastical Parish of St Andrew Malvern.
- The Parochial Church Council of the Ecclesiastical Parish of Malvern Wells & Wyche.
- The Parochial Church Council of St Mary's Pickersleigh.

We have one Data Controller (contact details below) and one Data Protection Policy for the Chase Team, covering the three parishes. This means it is our Parochial Church Councils that decide how any of your personal data that is held is used and for what purposes. Specifically, our Operations Manager (or in their absence someone will be appointed to cover this responsibility) is deemed to be the "Data Controller" on behalf of all three churches.



3. How do we process your personal data?

Our churches fully comply with their obligations under “GDPR” by keeping personal data up to date; by storing, processing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

We specifically use your personal data for the following purposes:

- To enable us to provide Christian services (e.g. baptisms, marriages, funerals and pastoral care) in the local area and beyond.
- To enable us to provide a voluntary service for the benefit of the public in our geographical areas.
- To administer membership records.
- To fundraise and promote the interests of the charities (i.e. the churches).
- To manage our employees and volunteers.
- To maintain our own accounts and records (including the processing of gift aid applications).
- To inform you of news, events, activities, requests and services running in The Chase Team and other churches in the area.
- To manage Safeguarding in our Parishes.
- If ever necessary, to share your appropriate contact details with the Diocese for the execution of their duties.
- To include your details in our Church Directory (subject to your agreement).
- To include you in our weekly mailing of events (subject to your consent).
- To include you in our Prayer Chain (subject to your agreement).
- To communicate with you.

To maintain records, we use:

- Our membership database (a local database that is held securely). It contains personal information (including names, addresses, contact information, dates of birth, roles and training) for each member of our church. Periodically we ask members to confirm their details.
- We are replacing our bespoke membership database and supporting systems with ChurchSuite, a package that will enable The Chase Team to be better organised and more effective in its administration. The ChurchSuite Privacy Notice can be found at link: <https://churchsuite.com/privacy-notice/> and it is aligned to our Data Privacy Notice. ChurchSuite is a proprietary product that is both GDPR ready and appropriately secure, i.e. providing we configure and use ChurchSuite properly and in keeping with our Data Privacy Notice, our use of ChurchSuite will be GDPR compliant, secure and adhere to our Data Privacy requirements.
- In keeping with the Diocese, we are moving to using Safeguarding Hubs to manage our Safeguarding information, including Disclosures. Safeguarding Hubs are provided by Clearly Simpler and GDPR compliant. The Safeguarding Hubs Data Processing Addendum can be found at link: <https://d3hgrlq6yacptf.cloudfront.net/639b4a393abf9/content/pages/documents/safegua>



[rding-hubs---data-processing-addendum---january-2025.pdf](#). Safeguarding Hubs Safeguarding Hubs are hosted on data servers provided by DigitalOcean LLC in the UK and they currently use no other sub-processors, but they will give us at least 30 days' notice of any proposed changes.

- We use local systems to hold and process data for local purposes including events, activities and communications. These will evolve and change over time, but will always have been checked first to ensure that they offer adequate security and their use will be recorded by the Churches. Typically, they may include:
 - Office 365 (including Teams / SharePoint) and MS Office for things like administration, church offices, events, availability, rotas, general correspondence, keeping in touch and to provide information on the planning of church activities, safeguarding, safety and security.
 - Eventbrite for personal details when booking on to events.
 - Doodle for personal contact details when attempting to organise events.
 - Dropbox and OneNote for programme data with names.
 - Customer/Client Relationship Management (CRM) systems for contact details to deploy relevant communications to member.
 - MailChimp and other bulk e-mailing systems for contact details to deploy relevant communications to member.
 - Hard copy / paper as appropriate.

4. What is the legal basis for processing your personal data?

- We will obtain your consent before adding your details to our membership systems and databases and in the process, you will decide whether you wish to be informed about things like church events, newsletters and prayers.
- We are required by law to collect and process data for weddings, funerals, baptism, etc.
- Processing is necessary for carrying out obligations under employment, social security or social protection law, or a collective agreement.
- Processing is carried out by the Churches (or by some person or organisation on their behalf once the Churches are satisfied that adequate data protection is in place) provided:
 - the processing relates only to members or former members (or those who have regular contact with it in connection with those purposes, e.g. parents / guardians of young people); and
 - there is no disclosure to a third party without consent (but see also Sharing your personal data below).

5. Sharing your personal data

Your personal data will be treated as strictly confidential and will only be shared with other members or parts of the Church of England for purposes connected with our churches. We will only share your data with third parties outside of the Church of England or outside of the UK with your consent.



However, ChurchSuite includes the following sub-processing provision and this will as we transition to using it:

While the ChurchSuite service and the marketing website are hosted within the UK we will share personal information to third parties outside of the UK or European Economic Area (EEA) but will only do so with our sub-processors, a list of which can be found on our website at link: <https://churchsuite.com/terms-of-service-third-party-sub-processors/>.

Where personal data is transferred outside of the UK we will only do so with that data which is absolutely necessary. If there is no suitable adequacy decision for the country to which the data is being transferred then we will carry out a transfer risk assessment and ensure other safeguards are implemented prior to transferring data. These can include:

- Standard Data Protection Clauses such as the International Data Transfer Agreement (IDTA) or the International Data Transfer Addendum (Addendum)
- Binding Corporate Rules in accordance with Article 47 of the GDPR (UK & EU)
- An exemption as defined in Article 49 of the GDPR (UK & EU)

6. How long do we keep your personal data?

We hold all personal data in accordance with the guidance provided by the Church of England and industry best practice for data privacy.

We review our data security arrangements on a regular basis (typically as systems and processes change) and at least annually. We maintain or record of who, where and how all personally identifiable information is retained and processed within our Churches.

We retain information regarding members' data while it is still current and then securely destroy the information when it is no longer relevant:

- For events, we securely destroy all personal information after the event is completed (unless there are any relevant residual legal issues such as health, safety and safeguarding).
- We keep data in accordance with the guidance set out in the guide "Keep or Bin: The Care of Your Parish Records": [Records management guides | The Church of England](#).

Specifically, we retain electoral roll data while it is still current; gift aid declarations and associated paperwork for up to 6 years after the calendar year to which they relate; and parish registers (baptisms, marriages, funerals) and certain safeguarding information permanently.

7. Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of your personal data which we hold about you (a Subject Access Request or 'SAR').
- The right to request that the churches correct any personal data if it is found to be inaccurate or out of date.



- The right to request your personal data is erased where it is no longer necessary for us to retain such data.
- The right to withdraw your consent to the processing at any time where we have obtained your consent.
- The right to request that the data controller provide you with your personal data in a structured, commonly used and machine-readable format. Also, to transmit that data directly to another data controller (in limited circumstances).
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing.
- The right to lodge a complaint with the Information Commissioners Office.

8. Further processing

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

9. Contact Details

To exercise all relevant rights, queries or complaints please in the first instance contact our Administrators (e-mail administrators@chaseteam.org, telephone 01684 576582, or write to our Church Office, St Andrew's Church Centre, Churchdown Road, Malvern, Worcestershire WR14 3JX). If they cannot provide an answer or if they have further queries, contact should be made with our Operations Manager (or their deputy) as our Data Controller.

This updated version was:

Approved by the All Saints PCC at their meeting on the 13th March 2025

Approved by the St Andrew's PCC at their meeting on the 20th March 2025

Approved by St Mary's PCC by correspondence on the 9th April 2025

