

# WCHCT Privacy Policy

## Introduction

We take privacy and confidentiality seriously and treat all the personal data you give us with great care. This Privacy Policy describes how the Trust collects and uses a limited amount of personal data from its members, and from others with whom it has dealings, exclusively in order to further the purposes of the Trust. Those purposes include encouraging wider interest in our historic religious buildings and raising and distributing funds to support their repair and renovation.

“Personal data” means any data about a living individual who can be identified by use of that data. “Processing” such information, that is storing and using it, is governed by the General Data Protection Regulation 2018 (the “GDPR”) under which the WCHCT as “Data Controller” has certain obligations. Contact details for WCHCT are given below.

## How do we process your personal data?

The WCHCT complies with its obligations by keeping personal data up to date; by storing 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 use personal data for the following purposes:

- Administration of WCHCT membership including sending out membership materials;
- Responding to requests for support and for tickets for our events;
- Administration of donations, benefactions, legacies;
- Administration and payment of our grants;
- Administration of contracts with us; and
- Limited research and statistical analysis to inform the work of the Trust.

Personal data provided to us will be used for the purposes for which you submit it and in accordance with whatever consent you may give for its future use. For completeness our photographic consent form is attached to this document

*For example:*

- If you are a member of the WCHCT, the uses will include sending you confirmation of your membership, subscription, and membership materials such as notification of the annual meeting and newsletters with details of our events and other activities.
- If you book with us to attend an event, we shall use your data to collect payment and to send you any ticket or joining instructions.
- If you sign up for *Ride and Stride* in any one year or for some other activity, you will be able to choose whether your details will be saved for future use so that we shall be able to contact you about related events in the future.
- If you provide us with personal data in connection with a grant application or potential application, you will be able to choose whether to go on a mailing list to receive further relevant information from us that may interest you.

- If you donate to the Trust, have done so in the past or pledge to do so in the future, we would like to report to you periodically on the Trust's progress and plans and to invite you to events. You will be asked whether you would like to stay in touch in this way.

You can, at any time, ask us to take you off a specific circulation list that you have joined or withdraw your consent for us to hold your data by completing and return the appropriate form which you will find in the GDPR link at the bottom of our website.

Personal data relating to children under a legally determined age (currently 16 years) cannot be processed without the consent of a parent or legal guardian.

## **What personal data do we process?**

WCHCT processes personal data that you give to it when you become a member of the Trust, register for one of its events, make a donation, apply for a grant or claim payment of a grant or enter into a contract with the Trust. The personal data collected will typically include your name, billing and delivery addresses, email address, telephone number, and banking details connected with any payment you are making.

We keep the details of any banker's standing order which you ask us to set up, and we hold Gift Aid declarations to allow the proper recording of your donations and to meet the legal requirements for audit. The law currently requires us to keep this information for a period of six years after the relevant payment date.

## **Information collected from visits to our website**

Currently we do not use third-party suppliers to collection information about how people arrive at our site and navigate through it - but, as is common practice, we may do so in the future

## **What are the legal grounds for our processing your personal data?**

- That the processing is necessary to fulfil a request which you have made such as establishing your membership and providing membership materials, providing you with a ticket for an event, or processing a donation or grant application made by you.
- That you have consented to our processing your personal data for some specific purpose which we have offered to you as an option.
- That the processing is necessary to fulfil a contract made with the Trust, e.g. contracts between the Trust and its service providers.
- That the processing is necessary to meet a legal requirement, e.g. for financial or tax audit.
- That the processing serves some legitimate purpose justifiable in the context of individual's interests and rights by the value it brings to the work of the Trust, e.g. research undertaken by the Trust to inform its overall planning to raise awareness of the needs of the county's historic churches, to support their sustainability, and to broaden participation in the Trust's activities.

## With whom do we share your personal data?

Personal data may be shared where necessary as follows:

- With WCHCT Trustees and officers of the Trust;
- With your specific consent, with other organisations such as local churches, trusts or other relevant funding bodies (we might recommend applicants to other funders or share details of applications with them - all applicants are asked if we may share their application details as part of our application process);
- With agents and other third parties acting for the Trust under contract or subcontract to undertake work such as maintaining our database and website and sending out mailings.

Personal data is collected and processed according to this policy and the Trust's security procedures. Under these procedures, an audit of categories of data held and permissions to access and use that data is undertaken by the Trustees at least annually. Third parties may use your data only for the purposes for which we pass it to them providing they follow security procedures which are at least as stringent as the Trust's.

## How long is your data kept?

Your data is held only for so long as the legal grounds for processing set out above apply. Records required for financial or tax audit have to be held for six years after the relevant transaction.

The nature of our work is such that we may have lifelong relationships with donors, beneficiaries and members. Legacy income is important to the running of the charity. We keep data as long as is necessary to carry out legacy administration and communicate effectively with the families of people leaving us legacies.

## Your rights and your personal data

Unless subject to an exemption under the GDPR, you may exercise the following rights with respect to your personal data free of charge: -

- The right to request a copy of your personal data which the Trust holds (in certain circumstances, that information to be available on request in transmissible digital form);
- The right to request that the Trust correct any personal data if it is found to be inaccurate or out of date;
- The right to request that your personal data be erased where it is no longer necessary for the Trust to retain such data;
- The right to withdraw any consent that you have given for your data to be processed;
- The right to object to the processing of personal data where the processing is justified by legitimate interests including research and statistical analysis;
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request that a restriction be placed on further processing such that it may be held but no longer used while the matter is addressed; and
- The right to lodge a complaint with the Information Commissioners Office

## Revision of this policy

This policy will be reviewed regularly by the Trustees and up-dated as necessary

If we wish to use your personal data for a new purpose not covered by this Policy, then we shall provide you with a new Policy explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we shall seek your prior consent to the new processing.

## Contacting us about your data or this policy

If you need to correct or update your basic membership details, please download the appropriate form here, (<http://warwickshirechurches.org.uk>) complete and send to the address on the form

For other matters connected with your data, or its use, or this policy, or to see your personal data held by us, please email [secretarywchct@gmail.com](mailto:secretarywchct@gmail.com) or write to the Secretary The Anchorage, 35 Sedlescombe Park, Rugby CV22 6HL

\*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.

## Changes to this Privacy Policy

We reserve the right to amend this policy at any time in response to your feedback, new or altered WCHCT systems and procedures, Internet best practices and UK and European law

Date of Review: July 2020



# Photographic Permission

WCHCT will only use photographs and videos for Legitimate use i.e. the purposes of its business - to advertise events and to promote the work of the Trust (i.e. on its website, in the press and in its literature). All photographs identified for use externally and which identify individuals need written consent which must be obtained prior to use. WCHCT will keep a register of photographs for which permission has been obtained and will destroy them upon the request of the named person in line with the provisions of the General Data Protection Regulation 2016

I ..... (print name)

Of ..... (post code and house name/number)

Give the WCHCT permission to use any photographs taken of me during the following event as outlined above

Event: BARD's RIDE 2019

Signed..... Ride number.....

Date.....2019

I ..... (print name)

Of..... (post code and house name/number)

Give permission for my/the child or children named below to have their photographs taken and to be used as outlined above

Print Names of Child/children with age and ride numbers:

Name	Age	Ride Number

Signed..... (Parent or guardian)

