

DATA PRIVACY NOTICE – Reviewed October 2025

The Mulbarton Group of Churches Benefice, consisting of the following legal bodies:

Mulbarton Parochial Church Council
Flordon Parochial Church Council
Bracon Ash Parochial Church Council
Hethel Parochial Church Council
Rev Adrian Miller – clergy licensed to the benefice

We use your data only to support the life and ministry of the churches, keep in touch with you, and care for our community.

1. Your personal data – what is it?

Personal data relates to a living 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 UK General Data Protection Regulation (UK GDPR) 2021, and the Data Protection Act (DPA) 2018.

2. Who are we?

Within the Mulbarton Group of Churches, there are 5 inter-connected legal entities, which in the terms of the GDPR are each considered to be data controllers. These data controllers are listed above, and we can be contacted using the details below. Being a "data controller" means that we decide how your personal data is processed and for what purposes.

These bodies are data controllers in common, and coordinate their responsibilities through the Benefice Administrative Assistant.

3. How do we process your personal data?

Each PCC and clergy-person within the Mulbarton Group of Churches complies with its obligations under the "GDPR" 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.

The PCCs and clergy use your personal data for the following purposes: -

- To enable us to provide a voluntary service for the benefit of the public in a particular geographical area as specified in our constitution;
- To administer membership records;
- To fundraise and promote the interests of the charity;
- To manage our employees and volunteers;
- To maintain our own accounts and records (including the processing of gift aid applications);
- To award financial assistance to those in hardship, or to other charities/agencies
- To operate the benefice website and deliver the services that individuals have requested, such as regular email updates, regarding new web content;
- To inform you of news, events, activities and services running within the benefice or related to the benefice;

- To enable church members, and members of the wider geographical area that we serve, to connect and communicate with one another directly.
- We may, on occasion, store records of pastoral encounters, relating to beliefs, relationships, etc., rather than purely factual information. If we deem this necessary, for example because of safeguarding concerns, then this information will be proportional, accountable, transparent to subjects, accessible to those who need it, accurate and secure. Paper records will be kept in a locked fire proof cabinet, behind locked doors, in Harvest House church office. Special care is taken for any digital records, including the use of password protection and/or encryption of files. Personal data may be shared with other appropriate agencies if necessary to prevent harm, in proportion to any risk assessed.
- We may on occasion take photos, at services or events, where individuals are identifiable. We will only make those photos public after consent from the subjects, for each photo used.

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

- Explicit consent from you as the data subject, so that we can keep you informed about news, events, activities and services and process your gift aid donations and connect you with others locally with whom you wish to be connected.
- Processing is necessary for carrying out obligations under employment, social security or social protection law, or a collective agreement;
- Processing is carried out by a not-for-profit body with a political, philosophical, religious or trade union aim provided: -
 - the processing relates only to members or former members (or those who have regular contact with it in connection with those purposes); and
 - there is no disclosure to a third party without consent.

5. Sharing your personal data

Your personal data will be treated as strictly confidential and will only be shared with other members of the churches in order to carry out a service to other church members or for purposes connected with the benefice. We partner with a number of third party data processors, who are contracted to process your data in compliance with strict privacy and security rules. These partners, and the reasons for which they process data are listed below:

- HMRC – for purposes relating to employment and Gift Aid
- Google – Google Sheets are used to record details of church service rotas, baptisms, wedding & funerals, quarterly diocesan returns, community volunteers, and PCC members
- Microsoft OneDrive – Church-related documents are stored by the Rector and Administrative Assistant, and other volunteers on Microsoft's OneDrive cloud based storage systems, including a spreadsheet of all pastoral contacts across the benefice
- ChurchNet – personal contact details, biographical details, photos and religious information may be processed on the ChurchNet server, for use on the benefice website and regular email updates, with consent of data subject.
- WhatsApp – Prayer Chain requests are shared on a closed group, end-to-end encrypted by WhatsApp, with messages auto-deleting after 90 days. Only admins of the group may post messages. Any information posted that identifies an individual requires consent, for which we provide a form, for full transparency.
- Facebook – personal contact details, biographical details, photos and religious information may be processed by Facebook, with consent of data subject.

- MailChimp – Email addresses, controlled by us and processed by MailChimp, are used by the Community Choir, and by church members, to facilitate communication.
- Survey Monkey – occasionally used to survey church members about specific topics.
- Various Banks – PCC bank account statements and payee details are processed by the banks, in relation to donors, grant recipients and those (both individuals and businesses) who have invoiced for work done or expenses claimed.

These providers may store data outside the UK. We use them under standard contractual terms that comply with UK data protection law.

6. How long do we keep your personal data¹?

We keep data in accordance with the guidance set out in the guide “Keep or Bin: Care of Your Parish Records” which is available from the Church of England website [see footnote for link].

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) permanently.

We keep other of your personal data for no longer than reasonably necessary.

- For prayer requests on the WhatsApp Group, we keep data for 90 days.
- For baptisms, weddings and funerals, as well as for hardship fund recipients, we keep your contact details unless or until you ask us not to do so. Part of our commitment to support and uphold, which is made during these times, is to keep in touch with relevant news which might facilitate such support.

We collect explicit consent forms from all regular church members, and others connected to the work and services of the church on a regular basis, not exceeding five-yearly intervals. When a full renewal of consent forms is undertaken, we will remove personal data held on the basis of explicit consent unless we receive a fresh consent form, granting that permission.

An individual may exercise their right to request the removal of personal data held about them at any point, and we will honour that request unless there is some legal reason why we must continue to hold data.

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 the Mulbarton Group of Churches holds about you;
- **The right to request a correction** to personal data that the Mulbarton Group of Churches holds about you if it is found to be inaccurate or out of date;
- **The right to request erasure** of your personal data where it is no longer necessary for the Mulbarton Group of Churches to retain such data;
- **The right to withdraw your consent** to the processing at any time;
- The right to request that the data controller provide the data subject with his/her personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable) [*Only applies*

¹ Details about retention periods can currently be found in the Record Management Guides located on the Church of England website at: - <https://www.churchofengland.org/about-us/structure/churchcommissioners/administration/librariesandarchives/recordsmanagementguides.aspx>

where the processing is based on consent or is necessary for the performance of a contract with the data subject and in either case the data controller processes the data by automated means];

- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request that a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable) [*Only applies where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics*];
- 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 Protection 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 the Benefice Administrative Assistant – admin@mulbchurch.org.uk or the Rector-
rector@mulbchurch.org.uk – or by phone on 01508 571167

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.