

## **PRIVACY NOTICE**

### **ROLE HOLDERS**

(E.g. Church employed staff, Church Board members, SPO, Ministry Leaders, Committee members, Team Leaders)

#### **Your personal data – what is it?**

“Personal data” is any information about a living individual which allows them to be identified from that data (for example a name, photographs, videos, email address, or address). Identification can be by the information alone or in conjunction with any other information. The processing of personal data is governed by the UK General Data Protection Regulation 2021 which sits alongside the Data Protection Act 2018.

#### **Who are we?**

This Privacy Notice is provided to you by the Chinese Church in London which is the data controller for your data.

The Chinese Church in London (CCiL) is made up of a number of different congregations and ministries who work together to deliver the Church’s mission in each community. The CCiL works together with:

- Colindale, Croydon, Hounslow, Stratford, New Soho Congregation, Cantonese, Mandarin and TAG English Congregations
- Carelinks, Outreach Action Team, Mission Concern Team and The Next Generation etc.

As the Church is made up of all of these persons and organisations working together, we may need to share personal data we hold with them so that they can carry out their responsibilities to the Church and our community. The organisations referred to above are joint data controllers. This means we are all responsible to you for how we process your data.

Each of the data controllers have their own tasks within the Church and a description of what data is processed and for what purpose is set out in this Privacy Notice. This Privacy Notice is sent to you by CCiL on our own behalf and on behalf of each of these data controllers. In the rest of this Privacy Notice, we use the word “we” to refer to each data controller, as appropriate.

#### **How do we process your personal data?**

The data controllers will comply with their legal obligations to keep personal data up to date; to store and destroy it securely; to not collect or retain excessive amounts of data; to keep personal data secure, and to protect personal data from loss, misuse, unauthorised access and disclosure and to ensure that appropriate technical measures are in place to protect personal data.

We use your personal data for some or all of the following purposes (for example some of the role-holders are volunteers and no financial information will be processed for these role holders): -

- To enable those who undertake pastoral care duties as appropriate (e.g. visiting the bereaved);
- To enable us to meet all legal and statutory obligations (which include maintaining and publishing our electoral roll in accordance with the Church Representation Rules);
- To carry out comprehensive safeguarding procedures (including due diligence and complaints handling) in accordance with best safeguarding practice from time to time with the aim of ensuring that all children and adults-at-risk are provided with safe environments;
- To deliver the Church’s mission to our community, and to carry out any other voluntary or charitable activities for the benefit of the public as provided for in the constitution and statutory framework of each data controller;
- To fundraise and promote the interests of the church and charity;
- To manage our employees and volunteers;
- To maintain our own accounts and records;
- To seek your views or comments;

# 華倫敦中華基督教會 Chinese Church in London

web: [www.ccil.org.uk](http://www.ccil.org.uk) email: [admin@ccil.org.uk](mailto:admin@ccil.org.uk)

Worship & Ministry Centre (Church Office)

69-71 Brook Green, London W6 7BE

020 7602 9092

- To notify you of changes to our services, events and role holders
- To send you communications which you have requested and that may be of interest to you. These may include information about campaigns, appeals, other fundraising activities;
- To process a grant or application for a role;
- To enable us to provide a voluntary service for the benefit of the public in a particular geographical area as specified in our constitution;
- We will process data about role holders for legal, personnel, administrative and management purposes and to enable us to meet our legal obligations, for example to pay role-holders, monitor their performance and to confer benefits in connection with their engagement as a Role Holder. "Role Holders" includes volunteers, employees, contractors, agents, staff, retirees, temporary employees, beneficiaries, workers, treasurers and other role holders.
- We may process sensitive personal data relating to Role Holders including, as appropriate:
  - Information about a Role Holder's physical or mental health or condition in order to monitor sick leave and take decisions as to the Role Holder's fitness for work;
  - The Role Holder's racial or ethnic origin or religious or similar information in order to monitor compliance with equal opportunities legislation;
  - In order to comply with legal requirements and obligations to third parties.
- Our processing also includes the use of CCTV systems for the prevention and prosecution of crime.

## What data do the data controllers listed above process?

- Names, titles, and aliases, photographs.
- Contact details such as telephone numbers (include mobile phones), addresses, and email addresses.
- Where they are relevant to our mission, or where you provide them to us, we may process demographic information such as gender, age, date of birth, marital status, nationality, education/work histories, academic/professional qualifications, employment details, hobbies, family composition, and dependants.
- Non-financial identifiers such as passport numbers, driving license numbers, vehicle registration numbers, taxpayer identification numbers, employee identification numbers, tax reference codes, and national insurance numbers.
- Financial identifiers such as bank account numbers, payment card numbers, payment/transaction identifiers, policy numbers, and claim numbers.
- Financial information such as salary, bonus, record of earnings, tax code, tax and benefits contributions, expenses claimed, creditworthiness, car allowance (if applicable), amounts insured, and amounts claimed.
- Other operational personal data created, obtained, or otherwise processed in the course of carrying out our activities, including but not limited to, CCTV footage, recordings of telephone conversations, IP addresses and website visit histories, logs of visitors, and logs of accidents, injuries and insurance claims.
- Other employee data (not covered above) relating to Role Holders including emergency contact information; gender, birth date, referral source (e.g. agency, employee referral); level, performance management information, languages and proficiency; licences/certificates, citizenship, immigration status; employment status, retirement date; billing rates, office location, practice and speciality; publication and awards for articles, books etc.; prior job history, employment references and personal biographies.
- The data we process is likely to constitute sensitive personal data because, as a church, the fact that we process your data at all may be suggestive of your religious beliefs. Where you provide this information, we may also process other categories of sensitive personal data: racial or ethnic origin, sex life, mental and physical health, details of injuries, medication/treatment received, political beliefs, labour union affiliation, genetic data, biometric data, data concerning sexual orientation and criminal records, fines and other similar judicial records.

## What is the legal basis for processing your personal data?

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Most of our data is processed because it is necessary for our legitimate interests, or the legitimate interests of a third party. An example of this would be our safeguarding work to protect children and adults at risk. We will always take into account your interests, rights and freedoms.

Some of our processing is necessary for compliance with a legal obligation. For example, we are required by the Association and the Bye Laws to administer and publish the electoral roll and to announce new members, baptisms, weddings etc.

We may also process data if it is necessary for the performance of a contract with you, or to take steps to enter into a contract. An example of this would be processing your data in connection with the hire of church facilities.

We will also process your data in order to assist you in fulfilling your role in the church including pastoral and administrative support or if processing is necessary for compliance with a legal obligation.

Religious organisations are also permitted to process information about your religious beliefs to administer membership or contact details.

Where your information is used other than in accordance with one of these legal bases, we will first obtain your consent to that use.

## Sharing your personal data

Your personal data will be treated as strictly confidential. It will only be shared with third parties including other data controllers where it is necessary for the performance of the data controllers' tasks or where you first give us your prior consent. It is likely that we will need to share your data with

- The appropriate bodies of the CCiL including the other data controllers.
- Our agents, servants and contractors. This sharing may be long-term or on-going. For example, we may ask a commercial provider to send out newsletters on our behalf; to maintain our database software; recording and monitoring of staff absence; information sharing on Google G Suite and Google Drive etc.
- Other ministry leaders or lay leaders nominated or licensed by CCiL.
- Other persons or organisations operating with the CCiL.
- Use of social media such as WhatsApp for church committees is limited to closed membership and by invitation by the administrator/s.
- We will disclose limited staff or members' data to recipients outside CCiL to potential employers, schools, letting agents, banks, staff's pension providers, Disclosure and Barring Service (DBS) checks for certain roles and organisations not mentioned here to provide references about you with your consent and/or at your request and in accordance with data protection law.
- Documents containing personal identifiable data between the Church Board, SPO, A&F, staff and committees shall be encrypted with appropriate password before sharing.
- Professional indemnity insurers and/or legal advisers where it needs to do so in order to defend any claim brought against it.
- To assist the government, police and other law enforcement authorities.

## How long do we keep your personal data?

We will keep some records permanently if we are legally required to do so. We may keep some other records for an extended period of time. For example, it is current best practice to keep financial records for a minimum period of 7 years to support HMRC audits. In general, we will endeavour to keep data only for as long as we need it. This means that we may delete it when it is no longer needed.

## Your rights and your personal data

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You have the following rights with respect to your personal data: -

When exercising any of the rights listed below, in order to process your request, we may need to verify your identity for your security. In such cases we will need you to respond with proof of your identity before you can exercise these rights.

1. The right to access information we hold on you
  - At any point you can contact us to request the information we hold on you as well as why we have that information, who has access to the information and where we obtained the information from. Once we have received your request, we will respond within one month.
  - There are no fees or charges for the first request but additional requests for the same data may be subject to an administrative fee.
2. The right to correct and update the information we hold on you
  - If the data we hold on you is out of date, incomplete or incorrect, you can inform us and your data will be updated.
3. The right to have your information erased
  - If you feel that we should no longer be using your data or that we are illegally using your data, you can request that we erase the data we hold.
  - When we receive your request, we will confirm whether the data has been deleted or the reason why it cannot be deleted (for example because we need it for our legitimate interests or regulatory purpose(s)).
4. The right to object to processing of your data
  - You have the right to request that we stop processing your data. Upon receiving the request, we will contact you and let you know if we are able to comply or if we have legitimate grounds to continue to process your data. Even after you exercise your right to object, we may continue to hold your data to comply with your other rights or to bring or defend legal claims.
5. The right to data portability
  - You have the right to request that we transfer some of your data to another controller. We will comply with your request, where it is feasible to do so, within one month of receiving your request.
6. The right to withdraw your consent to the processing at any time for any processing of data to which consent was sought.
  - You can withdraw your consent easily by telephone, email, or by post (see Contact Details below).
7. The right to object to the processing of personal data where applicable.
8. The right to lodge a complaint with the Information Commissioners Office.

## Transfer of Data Abroad

Any electronic personal data transferred to countries or territories outside the UK will only be placed on systems complying with measures giving equivalent protection of personal rights either through international agreements or contracts approved by the UK. Our website is also accessible from overseas so on occasion some personal data (for example in a newsletter) may be accessed from overseas.

## 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.

## Changes to this notice

We may change our privacy notices and policy from time to time in which case we will upload the updated notices to our website. It is advisable to refer to the privacy notices regularly, particularly before sharing information about yourself which you consider to be sensitive.

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### Contact Details

Our Head of Operations (Nicole Wu) is our **Data Protection Officer**. Please contact us if you have any questions about this Privacy Notice or the information we hold about you or to exercise all relevant rights, queries or complaints at:

Chinese Church in London  
69-71 Brook Green  
Hammersmith  
W6 7BE  
Tel: 02076029092  
Email: [admin@ccil.org.uk](mailto:admin@ccil.org.uk)

We are registered with the Information Commissioner's Office ('ICO') with registration number **ZA478008**. 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.

*Privacy Policy Role Holder written 15/03/2018; Updated 21/12/2022*