

# PRIVACY NOTICE

## THE FRIENDS OF LICHFIELD CATHEDRAL

*Registered Charity Number 1102791*

### 1. Your personal data – what is it?

**“Personal data”** is any information relating to a living individual (referred to in this Privacy Notice as **“you”**) who can be directly or indirectly identified from it. This includes name, address, contact details or photo but could also include two or more non-specific pieces of information that when combined could identify specific individuals, including, for example, a combination of gender, birth date or geographic indicator. Some personal data, for example data relating to religious belief, is classified as **“special category”**.

The processing of personal data is governed by the General Data Protection Regulation (EU)2016/679 (the **“GDPR”**) and other legislation relating to personal data and rights such as the Human Rights Act 1998. **“Processing”** means anything done with personal data, including obtaining, storing, updating, sharing and disposing of it.

### 2. Who are we?

The Friends of Lichfield Cathedral (referred to in this Privacy Notice as **“we”** or the **“Friends”**) is termed a **“data controller”** under the GDPR. This means that we decide how your personal data is processed and for what purposes.

In this Privacy Notice, members of the Friends are referred to as **“members”** and donors who are not members are referred to as **“donors”**. The terms **“you”** and **“your”** may relate to both.

### 3. What personal data do we process?

We process all or some of the following personal data belonging to members and donors:

- name and title;
- address;
- landline and/or mobile number(s);
- email address;
- financial identifiers such as bank account numbers, payment card numbers, payment/transaction identifiers; and
- donation history.

We collect this information when you become a member, when you pay for a Friends’ event, when you make a donation (whether as a member or donor) or during the course of your membership. We do not process any special category data.

### 4. How do we process your personal data and for what purposes?

We comply with our 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 personal data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect it.

Under the terms of a Database Management Agreement dated 24th November 2018 between the Friends and Lichfield Cathedral (the **“Cathedral”**) (the **“Agreement”**), the Cathedral provides certain services to the Friends, including processing membership applications, maintaining the membership database, recording donations from members and donors and managing communications with members and donors in accordance with instructions from the Friends. In the context of the Agreement, the Friends is the **“controller”** and the Cathedral is the **“processor”**; the Agreement contains the mandatory clauses required by Article 28(3) of the GDPR for contracts between controllers and processors, including an obligation as to confidentiality.

A copy of the Agreement is available from the Friends' Administrator referred to in Clause 11 below.

We use your personal data for some or all of the following purposes:

- To administer our membership records;
- To distribute our Annual Report, newsletters and information about forthcoming Friends' trips, fundraising events and other initiatives;
- To invite members to the Friends' Annual General Meeting;
- To invite members to occasional talks, tours and exhibition previews arranged by us or by the Cathedral;
- To inform members from time to time about services, events and other initiatives in the life of the Cathedral;
- To acknowledge receipt of donations;
- To maintain our accounts and records;
- To process gift aid applications/gift aided donations and other donations;
- To notify you of a change to, or cancellation of, an event or activity for which a booking has been made; and
- To ask if you would be willing to help with, for example, a Friends' event, a visit to Lichfield by another cathedral friends' group or packing/hand delivering mail shots.

### **5. What is the lawful basis for processing your personal data?**

Article 6 of the GDPR sets out six lawful bases according to which we may process your personal data. Those which are most relevant to us are:

- Legitimate interests - processing is necessary for our legitimate interests or the legitimate interests of a third party (the Cathedral), except where such interests are overridden by your interests, rights or freedoms. For example, it is in our legitimate interests to inform members about forthcoming Friends' trips, fundraising events and other initiatives and from time to time to inform you about services, events and other initiatives in the life of the Cathedral. *See Note below.*
- Legal obligation - processing is necessary to comply with legislation governing, for example, gift aid; and
- Consent - your explicit consent.

*Note: If we send you any of this information by electronic means (email, telephone or text), we need your explicit consent under the Privacy and Electronic Communications Regulations.*

### **6. Sharing your personal data**

Your personal data will be treated as strictly confidential, we will never sell it to anyone and we will only share it on a need to know basis with:

- the Friends' Administrator;
- other Cathedral staff who are authorised to process members' and donors' personal data as described in the Agreement;
- relevant members of the Friends' Executive Committee e.g. our Events Secretary and Administrator or Treasurer will process payments for events;
- the Dean of Lichfield Cathedral, as Chairman of the Friends, and his Personal Assistant;
- Friends' members who assist with packing and hand delivery of mail shots; and/or
- a third party where we are required to do so by law (e.g. HMRC for gift aid processing) or where we have your explicit consent.

### **7. How long do we keep your personal data?**

We keep:

- your contact details for as long as you remain a member;
- gift aid declarations and associated paperwork as required by HMRC; and
- your donation history indefinitely. It can be helpful to have evidence of this and of your relationship with the Friends over the years in the event that you leave a legacy in your will.

## 8. Your rights and your personal data

Unless we are subject to an exemption under the GDPR, you have the following rights with respect to any of your personal data which we hold:

- The right to request a copy of such data;
- The right to request that we correct such data if it is found to be inaccurate, incomplete or out of date;
- The right to request that such data is erased where it is no longer necessary for us to retain it;
- The right to object to the processing of such data (this right only applies where processing is based on legitimate interests). For example, you may ask us by telephone, email or post (see clause 11) to stop communicating with you;
- The right to request that we transfer such data to another data controller (the “right to data portability”). This right only applies in limited circumstances.
- The right to withdraw your consent to the processing of such data. You may withdraw your consent by telephone, email or post (see clause 11);
- The right, where there is a dispute in relation to the accuracy or processing of such data, to request that a restriction is placed on further processing until the dispute has been resolved; and
- The right to lodge a complaint with the Information Commissioner’s Office.

## 9. Further processing

If we wish to use your personal data for a new purpose, not covered by this 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.

## 10. Changes to this notice

We keep this Privacy Notice under regular review and any updates will be held by our Administrator and placed on the Friends’ page of the Cathedral’s website. This Notice was written in January 2019.

## 11. Contact Details

To exercise all relevant rights, queries or complaints, please contact:

The Administrator The Friends of Lichfield Cathedral 19a The Close Lichfield Staffordshire WS13 7LD	Telephone: 01543 622460  Email: <a href="mailto:friends@lichfield-cathedral.org">friends@lichfield-cathedral.org</a>
--	--

You may contact the Information Commissioner’s Office at:

Information Commissioner’s Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF	Telephone: 0303 1231113  Email: <a href="https://ico.org.uk/global/contact-us/email/">https://ico.org.uk/global/contact-us/email/</a>
--	---