



## Privacy Notice - General

### Introduction

This notice explains how the information about you which we hold is used and managed, and your rights with respect to that data. For groups of people where we hold substantial amounts of data there are separate privacy notices which are referred to in this document. For details of data gathered by our website please see the privacy notice on our website <https://www.peterborough-cathedral.org.uk/home/privacy-policy>

We have developed this notice so that you can feel confident about the privacy and security of the personal information that you provide to us.

### 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 our possession or likely to come into such possession. The processing of personal data is governed by the General Data Protection Regulation 2016/679 and the GDPR and the Data Protection Act 2018, (the “DPA 2018”)

### How do we process your personal data?

We comply with obligations under the UK- DPR and DPA 2018 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. You are responsible for ensuring the accuracy of all the personal data you supply to us and we will not be held liable for any errors unless you have advised us previously of any changes in your personal data.

This privacy notice applies to all personal data – including special or sensitive personal data – processed by the Cathedral. Please note that this notice covers a wide range of processing activities and therefore much of its contents may not be relevant to you.

Your personal data may be processed by members of Cathedral staff or volunteers for purposes connected with Cathedral business, which includes the following:

- To support the mission and ministry of the Church of England

- The pastoral care of people external to and within the congregation, including clergy and their families
- Carrying out comprehensive safeguarding procedures in accordance with best safeguarding practice
- Managing employment records of those who work for The Chapter of Peterborough Cathedral
- Managing the volunteer records of those who volunteer for the Cathedral
- Maintaining the accounts and records of the Chapter of Peterborough Cathedral (including the processing of gift aid)
- Maintaining records and correspondence linked to the Chapter's responsibilities as a landlord
- Maintaining records of the Cathedral Choirs and Choristers
- To fundraise and promote events, services and exhibitions
- To inform you of news, events and activities and services happening throughout the Cathedral

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

Unless otherwise indicated in Appendix 1, we process your personal data in the course of our legitimate activities as a not-for-profit body with a religious aim.

Most of the data we hold is processed under the lawful reason of legitimate interest, that is, that we need to process the data in order to fulfil our responsibilities at the Cathedral on behalf of the Chapter of Peterborough Cathedral. An example of this would be the pastoral care of a member of the Cathedral congregation or to deal with a safeguarding issue. Some of our processing is to comply with legal obligation. 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. We may process information about your religious beliefs, this is permitted for religious organisations to administer membership or contact details.

### **Sharing your personal data**

Your personal data will be treated as strictly confidential, and may be shared only when necessary with other Cathedral bodies, Peterborough Cathedral Trust, institutional bodies that comprise governmental departments and the Church of England for the purposes of administrative functions required by your connection with The Chapter of Peterborough Cathedral. The exception to this is where it is in the public interest and is necessary for the purposes of protecting an individual from neglect or physical, mental or emotional harm; or protecting the physical, mental or emotional well-being of an individual where that individual is a child or is an adult at risk.

Personal Data may be shared with third party Service Providers – including:

- Salesforce - our data software processing provider
- Glow – our website providers
- Mail Chimp - through which we coordinate email communications, such as email newsletters

- Ticket Island - through which events and services are booked and our online shop is managed
  - CoopSys - the Managed Service Provider for our IT
  - Integrity Team – Our IT consultants
  - Ticket Source – through which events and services are booked
  - Thirtyone:eight – an independent Christian safeguarding charity, who conduct Disclosure and Barring Service (DBS) checks on our behalf, as well as offering other safeguarding support services
  - Peterborough Cathedral Trust – Our partner organisation who fundraise for the Cathedral
  - Other providers such as payroll, human resource services
- Otherwise, we will only share your data with third parties with your consent.

### **Transferring personal information outside the European Economic Area**

Peterborough Cathedral will not transfer your personal information to countries outside the European Economic Area. Where data transfer is required, for example in relation to our international link diocese, separate consent will be sought.

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

We keep your personal data for no longer than reasonably necessary for the periods and purposes in accordance with the guidance set out in the guide “Chapter and Verse: The Care of Cathedral Records”, which is available from the Church of England website: <https://www.churchofengland.org/more/libraries-and-archives/records-management-guides>

### **Your rights and your personal data**

Unless subject to an exemption under the UK- GDPR or DPA 2018, you have the following rights with respect to your personal data:

- Request access to your personal information – this is usually known as making a ‘data subject access request’ and it enables you to receive a copy of the personal information we hold about you
- Request rectification of your personal information if it is incorrect – this enables you to have any inaccurate or incomplete personal information we hold about you corrected.
- Request the erasure of your personal information – this enables you to ask us to delete or remove your personal information where there’s no compelling reason for its continued processing; e.g. it’s no longer necessary in relation to the purpose for which it was originally collected
- Restrict the processing of your personal information – this enables you to ask us to suspend the processing of your personal information; e.g. if you contest its accuracy and so want us to verify its accuracy
- The right to object to the processing of personal data, (where applicable)
- The right to lodge a complaint with the Information Commissioner who may be contacted at [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns) or telephone 0303 1231113

If you wish to exercise any of these rights, please contact our Data Protection Officer. We may need to request specific information from you in order to verify your identity, and check your right to access the personal information or to exercise any of your other rights.

### Changes to this Privacy Notice

Peterborough Cathedral reserves the right to update or amend this Privacy Notice at any time. We keep this Privacy Notice under regular review and we will place any updates on this web page.

### Complaints

If you believe that Cathedral has not complied with your data protection rights, please contact our Data Protection Officer. You also have the right to complain to the Information Commissioner's Office ('ICO') at any time. The ICO is the UK supervisory authority for data protection issues and contact details can be found on the ICO website – [www.ico.org.uk](http://www.ico.org.uk).

### How to contact us

If you have any questions about this Privacy Notice, how we handle your personal information, to update your information, queries or complaints please contact:

**Data Protection Officer:** Natalie Freeman

**Email:** [data@peterborough-cathedral.org.uk](mailto:data@peterborough-cathedral.org.uk)

**Data Controller for Peterborough Cathedral:** Janet Armitage

**Email:** [data@peterborough-cathedral.org.uk](mailto:data@peterborough-cathedral.org.uk)

### Privacy Notice - Legitimate Interest Assessments

We have a specific purpose with a defined benefit	Which is to communicate in the most efficient, effective and appropriate means with officers, staff and clergy within the Peterborough diocese on issues relating to administrative, legislative and regulatory matters.
The processing is necessary to achieve the defined benefit.	It is not possible to achieve the purpose without the processing of the information which is limited on the basis of need to fulfil the purpose.
The purpose is balanced against, and does not override, the interests, rights and freedoms of data subjects.	The purpose of the processing allows the staff, clergy, officer to successfully fulfil the obligations of their role. Access to the data being processed is restricted to those who need it.

Where the legal basis under which we hold your data is legitimate interest we are required to justify that it is appropriate to use the lawful basis 'legitimate interest'. To do this we complete a legitimate interest assessment. A summary of each of these assessments which relate to this privacy notice is below.

For a copy of the full Legitimate Interest Assessment, please contact [data@peterborough-cathedral.org.uk](mailto:data@peterborough-cathedral.org.uk)

**Including but not limited to:**

**Pastoral care of congregation members**

I have a specific purpose with a defined benefit	To provide pastoral care to members of the Congregation
The processing is necessary to achieve the defined benefit.	Yes
The purpose is balanced against, and does not override, the interests, rights and freedoms of data subjects.	The congregation member's rights and freedoms are overridden, but with the benefit to them of providing pastoral care and support. Strict procedures are in place to ensure that contact details are not shared outside the Chapter of Peterborough Cathedral (unless there is deemed a safeguarding risk)

**Interviews for staff posts**

I have a specific purpose with a defined benefit	To appoint the most suitable candidate to a post
The processing is necessary to achieve the defined benefit.	Without processing it would not be possible to ensure that an appropriate candidate was being appointed
The purpose is balanced against, and does not override, the interests, rights and freedoms of data subjects.	The processing does legitimately override the rights and freedoms of the candidate, but this is important to ensure that the right candidate is appointed

### Temporary mailing lists for events, communications and Christmas cards

I have a specific purpose with a defined benefit	To form temporarily held mailing lists to allow for invitations to events, sending of Christmas Cards or other communications from the Cathedral Office
The processing is necessary to achieve the defined benefit.	Yes. It would not be possible to complete this defined purpose without creating temporary lists.
The purpose is balanced against, and does not override, your interests, rights and freedoms.	The processing does legitimately override the subjects' rights and freedoms, however without this it would not be possible to make appropriate invitations or contact which may well be of benefit to the data subject. There is a procedure in place to ensure that only up to date contact information is kept for an appropriate length of time.

### General correspondence

I have a specific purpose with a defined benefit	Processing general correspondence received in the office
The processing is necessary to achieve the defined benefit.	It is not possible to respond appropriately to correspondence without this processing
The purpose is balanced against, and does not override, the interests, rights and freedoms of data subjects.	The interests, rights and freedoms of the data subjects are not overridden as it is reasonable to assume that correspondence sent to and responded to by an office will be kept for an appropriate amount of time.

### Donations and giving

I have a specific purpose with a defined benefit	To keep a record of your relationship with us and for internal administrative purposes (such as our accounting and records), and to let you know about changes to our fundraising.
The processing is necessary to achieve the defined benefit.	It is not possible to respond appropriately to donors without this processing
The purpose is balanced against, and does not override, the interests, rights and freedoms of data subjects.	The interests, rights and freedoms of the data subjects are not overridden as it is reasonable to assume that correspondence sent to and responded to by an office will be kept for an appropriate amount of time