

FREE CHURCH OF SCOTLAND

DATA PRIVACY NOTICE – HOW WE USE YOUR PERSONAL INFORMATION

This privacy notice explains the way in which the Free Church of Scotland uses, or “processes” your personal information (also called “personal data”) including, but not limited to, when you use or supply information on our website. Personal information is any information, held either in paper records or electronically, from which you can be identified. Some examples of personal information are your name, address, email address, date of birth, telephone number, IP address, photograph, video image, bank details, etc. The processing of personal information is governed by data protection law. “Processing” is anything that is done with personal information, from collection onwards.

The Free Church of Scotland is the “data controller” in terms of data protection regulations as we decide on the purposes and means of how your personal information is processed. We may change this policy from time to time and any changes will be published on our website. Our contact details are provided below.

Our processing of personal information

In general terms, we process personal information to enable us to further the charitable purposes of the Free Church of Scotland. We do this through our trustees, staff and volunteers. In particular, we process personal information for specific purposes which include, but may not be limited to, the following:

- To fulfill contractual and other legal obligations;
- To maintain accounts and records, including Gift Aid administration.
- For payroll administration.
- To recruit and manage employees and volunteers.
- To maintain lists of names and contact details of our Ministers, Elders, Deacons, members of Finance Committees, congregational Treasurers and congregational property trustees.
- To maintain lists of names and contact details of members of our various Boards and Committees.
- To maintain lists of names and contact details of our Safeguarding Coordinators.
- To maintain lists of names and contact details of our other volunteers.
- In relation to safeguarding vulnerable groups, to obtain references and other recruitment information, including disclosure information, regarding our volunteers and paid staff, and generally in relation to compliance with safeguarding legislation and our Safeguarding Policy and Guidelines.
- In relation to children and young people attending Free Church Youth Camps, and in relation to individuals participating in other church events and activities, including children and young people. In addition to contact details, this may include dietary requirements and health information.
- To provide information about church news, events, and activities.
- To maintain membership records.
- To maintain baptismal records.
- In relation to the provision of counselling and pastoral care.
- For fundraising.
- For administration of education and training courses provided by Edinburgh Theological Seminary.
- In relation to the selection and training of ministers.
- For managing properties, including sales, purchases and leases.
- Where CCTV is in place, for the prevention and detection of crime.

Lawful bases for processing personal information

We are required by law to identify at least one appropriate legal basis for processing personal information. We process personal information where at least one of the following legal bases applies:

- The processing is necessary for the purposes of the legitimate interests of the Free Church of Scotland, and such interests are not overridden by your interests or fundamental rights and freedoms.
- The processing is necessary for the performance of a contract with you.
- The processing is necessary for compliance with a legal obligation.
- You have given your consent to the processing for one or more specific purpose. Where this basis for processing applies you are entitled to withdraw such consent at any time, using the contact details provided below.

Further, where we process personal information which is more sensitive than other types and is classed by law as 'special category data'¹ we will, in addition to meeting a minimum of one of the legal bases listed above, ensure that at least one of the following applies:

- Processing is carried out in the course of the legitimate activities of the Free Church of Scotland with appropriate safeguards by us as a not-for-profit body with a religious aim, and on condition that the processing relates solely to our members, or to former members, or to people who have regular contact with us in connection with our purposes, and that the personal information is not disclosed outside the Free Church of Scotland without your consent.
- Processing is necessary for the purposes of the Free Church of Scotland carrying out its obligations under employment, social security or social protection law.
- Processing is necessary for archiving purposes in the public interest, historical research purposes or statistical purposes.
- Processing relates to data which are manifestly made public by you.
- You have given explicit consent to the processing of your personal information for one or more specified purpose. You are entitled to withdraw such consent at any time, using the contact details provided below.

Sharing of information

Only individuals appointed to specific roles within the Free Church of Scotland can access your data. We will not share your data outside the Free Church of Scotland without your consent, properly obtained, unless we are permitted or obliged to do so by law. In particular, we may share your data with our professional advisers (including the statutory auditor, solicitors and pension consultants) and regulatory bodies (including, but not limited to, HM Revenue and Customs and the Department for Work and Pensions). We may share your data with the Free Church of Scotland Pension Scheme Trustees Limited for purposes of pension administration, and University of Glasgow and Student Awards Agency Scotland in relation to administration of student degree programmes. Your data may also be shared with processors for particular outsourced activities, such as bulk printing jobs, bulk mailing lists, offsite backup and archive.

¹ Defined in the GDPR as 'Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.'

The proceedings of the Free Church of Scotland General Assembly are public meetings which are filmed and live streamed, and at which official photographs are taken for use on this website and in magazines such as The Record. Procedures are in place to ensure that only individuals who are willing are filmed or photographed.

Security and retention of personal information

We are committed to ensuring that personal information is held and retained securely and in accordance with data protection principles. More specifically, we keep data in accordance with the guidance set out in our Data Retention Policy.

Web browsing and cookies

Cookies, small files that your web browser may place on your computer's hard drive, are used to enhance users' experience of a website through the collection of information about how a website is used. Further details of our use of cookies is given in our cookie policy.

You have the right to make certain requests in relation to your personal data, as follows:

- You can request copies of the personal data which we hold about you, using the contact details provided below.
- If you believe that any information we hold about you is inaccurate or incomplete, please let us know so that we can have this rectified.
- You can request that we erase your data if there is no longer any need for us to keep it, although we may still need to retain it if the reasons why it was obtained still exist. If the only legal basis on which we hold the data is your consent, and you withdraw that consent, then we will erase your data on request.

In addition, you have other rights in relation to your personal data, which are less likely to be relevant than the ones listed above. Further information can be obtained on request from us or from the Information Commissioner's Office (all contact details provided below).

Our contact details

You can contact us at Free Church of Scotland, 15 North Bank Street, The Mound, Edinburgh, EH1 2LS, at offices@freechurch.org, or on 0131 226 5286.

The Information Commissioner's Office

You have the right to contact to the Information Commissioner's Office on 0303 123 1113 or its website at www.ico.org.uk or at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.