



Carlisle Cathedral

General Privacy Notice

This Privacy Notice explains how the Chapter of Carlisle Cathedral, Carlisle Cathedral Enterprises Ltd and the Carlisle Cathedral Development Trust protects and manages any personal data that is shared with us, and how we collect, process, protect and share that data.

When we say 'we' we mean Carlisle Cathedral, together with the Development Trust and Carlisle Cathedral Enterprises Ltd, on whose behalf the Cathedral collects, processes and holds some personal data. The Cathedral is the data controller for information in this Privacy Notice. This means we are responsible for deciding how we can use personal data. The Cathedral is committed to being transparent about how it collects and uses personal data and to meeting its data protection obligations.

What information does the Cathedral collect?

The Cathedral collects and processes a wide range of information such as:

- Name, address and contact details, including email addresses and telephone numbers;
- Where they are relevant to our mission, or where provided 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, family composition and dependents;
- When donations or payments are made for activities, financial identifiers such as bank account numbers, payment card numbers, payment/transaction identifiers;
- The data we process is likely to constitute sensitive personal data because, as a church, the fact that we process personal data at all may be suggestive of a person's religious beliefs.

We collect this information in a variety of ways. We may collect information in different places including directly from someone; from another organisation (see below); or from publicly available sources. In some cases, we collect personal data from third parties, such as information from criminal records checks permitted by law. Data is stored in a range of different places, including filing cabinets and the Cathedral's IT and email systems.

Why does the Cathedral process personal data?

Most of our data is processed because it is necessary for our legitimate interests, or the legitimate interests of a third party (such as another Cathedral within the Church of England). Examples of this would be to deliver the Cathedral's mission to our community; our safeguarding work to protect children and vulnerable adults at risk; to carry out work with our volunteers, charitable activities and fundraising; and to administer the Cathedral, Enterprises Ltd and the Development Trust. We will always take into account the interests, rights and freedoms of those whose personal data we collect.

Some of our processing is necessary for compliance with a legal obligation, for example the requirements of the Cathedral Constitution and Statutes include administering the Cathedral Community Roll, or collating signing-in details at some Cathedral activities to comply with health and safety requirements.

We may process data if it is necessary for the performance of a contract, or to take steps to enter into a contract. Examples of this would be processing personal data in connection with attendance on a training course, and to process information relating to professional contractors and suppliers.

We may also seek views or comments, and we may send out communications which have either been requested and or that we think may be of interest. These may include information about Cathedral activities, campaigns, appeals, events or other fundraising activities.

Religious Cathedrals are also permitted to process information about a person's religious beliefs to administer membership or contact details.

Who has access to data?

All personal data will be treated as strictly confidential. Personal information will be shared internally and, where relevant, with our affiliated organisations including the Friends of Carlisle Cathedral, and the Carlisle Cathedral Choirs Association, where it is necessary for performance of the data controllers' tasks, or where we have been given consent. It is likely that we will need to share some personal data with some, or all, of the following:

- The appropriate bodies of the Church of England, including the other data controllers within the Church of England.
- Our agents and contractors. For example, we may ask a commercial provider to maintain our database software.
- Other clergy or lay persons nominated or licensed by the Bishop of the Diocese of Carlisle to support the Cathedral's mission. For example, our clergy are supported by our Pastoral Link Visitors who may provide confidential mentoring and pastoral support. Assistant or temporary ministers, including curates, deacons, licensed lay ministers, commissioned lay ministers or persons with Bishop's Permissions may participate in our mission in support of the Cathedral's regular clergy.
- Other organisations or data controllers operating within the Diocese of Carlisle including, where relevant, the Carlisle Diocesan Board of Finance and Cumbria Christian Learning, the Diocesan Board for Education, Churches Trust for Cumbria and our ecumenical partners including the Salvation Army, the Methodist and United Reformed Churches.
- Relevant educational partners where appropriate.

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

How does the Cathedral protect data?

The Cathedral takes the security of personal data seriously. The Cathedral has internal policies and controls in place to try to ensure that personal data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees or clergy in the performance of their duties.

Where the Cathedral engages third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

For how long does the Cathedral keep 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

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your personal data on request;
- require the Cathedral to change incorrect or incomplete data;
- require the Cathedral to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing. 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));
- object to the processing of your data where the Cathedral is relying on its legitimate interests as the legal ground for processing. 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; and
- ask the Cathedral to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override the Cathedral's legitimate grounds for processing data;
- request that we transfer some of your data to another controller.

When exercising any of the rights listed above, 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. There are no fees or charges for the first request but additional requests for the same data may be subject to an administrative fee. If you would like to exercise any of these rights, please contact the Cathedral Office.

Further processing

If we wish to use personal data for a new purpose, not covered by this Privacy Notice, then we will provide 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 prior consent to the new processing.

Changes to our Privacy Notice

We keep our Privacy Notice under regular review and we will place any updates on the website www.carlislecathedral.org.uk. This Privacy Notice was last updated in May 2018.

Data Controller – contact details for the Data Controller as follows:

Cathedral Office
7 The Abbey
Carlisle CA3 8TZ

Email: office@carlislecathedral.org.uk

Telephone: 01228 548151

If you believe that the Cathedral has not complied with your data protection rights, you can complain to the Information Commissioner's Office at www.ico.org.uk.