

# MKCC

## Privacy Policy

### Our Principles

MKCC is committed to protecting your privacy in line with requirements of 1988 Data Protection Act and the General Data Protection regulation (GDPR). We will seek to be transparent with regards to our storage of your personal data, processing of your personal data and our communications concerning the personal data we hold.

- Personal data will be fairly and lawfully processed;
- Personal data will be processed for the limited purposes outlined below;
- Personal data will be adequate, relevant and not excessive;
- Personal data will be accurate and up to date;
- Personal data will only be held for as long as is necessary;
- Personal data will be processed in line with the data subject's rights;
- Personal data will be secure; and
- Personal data will not be transferred to other countries.

### Use of personal information

MKCC holds personal information about staff, church partners, regular church attendees, individuals associated with other churches or Christian organisations and other individuals who have provided such information for a specific purpose. We use this information for several main purposes:

- The day-to-day administration of the church; e.g. pastoral care and oversight including calls and visits, preparation of ministry rotas, maintaining financial records of giving for audit and tax purposes;
- Statistical analysis; gaining a better understanding of church demographics. N.B. although collated church data may be passed to a third party, such as number of small groups or small group's attendance, no personal data will be disclosed;
- Contacting you to keep you informed of MKCC activities, events or resources;

Our legal basis for using your data is 'consent of the data subject' (general emails/SMS), 'processing is necessary for compliance with a legal obligation' (My ChurchSuite password resets, consent request emails and registration success emails), 'legitimate interest' (event/small group sign-up, ministry notification emails, requests for specific information) and 'not-for-profit body with a religious aim processing data of members or former members (or those who have regular contact with us) and not disclosing to a third party without consent'.

We will not disclose your information to a third party unless:

- We are legally compelled to do so;
- We have a duty to the public to disclose;
- Where disclosure is required to protect your interest; and/or
- Where disclosure is made at your request or with your consent.

We will respect your email privacy. You will only receive emails from MKCC in relation to information you have requested. All church members automatically receive our regular e-news email but are able to unsubscribe at any time via the instructions at the bottom of the

e-news email. We will also email information to church members if they have signed up to receive it through our cloud-based administration system.

## Applying our principles

MKCC uses several cloud-based administration systems to secure your data. These systems use industry standard technology, SSL encryption, making it nearly impossible for anyone else to see your data when it is loaded onto the system. Your data is stored on servers within the UK.

From time to time, employees of those companies who support our cloud-based administration systems may be required to access our systems in order to resolve technical issues – access to our system will be at our request and restricted for the period of time it takes to resolve the technical difficulty.

All other access to our databases is strictly controlled through the use of name specific passwords, which are selected by the individual.

- Those authorised to use our databases only have access to their specific areas of use. This is controlled by the Data Protection Officer (Mr Ian Baird) and other specified administrators and they alone can access and set these security parameters.
- People who will have secure and authorised access to your data may include MKCC Church Staff, volunteer data in-putters, Department heads, Ministry Team Leaders and Small Group Leaders.
- Databases will NOT be accessed by any authorised users outside of the EU, in accordance with the Data Protection Act & General Data Protection Regulation, unless prior consent has been obtained from the individual whose data is to be viewed.
- All access and activity on the database is logged and can be viewed by the Data Controller.
- Subject Access – all individuals who are the subject of personal data held by MKCC are entitled to:
  - ask what information MKCC holds about them and why;
  - how to gain access to it;
  - be informed how to keep it up to date;
  - be informed what MKCC is doing to comply with its obligations under the 1988 Data Protection Act & General Data Protection Regulation;
  - have their data removed with immediate effect; and
  - complain to the Information Commissioners Office if unhappy with MKCC's handling of data.
- MKCC will not charge you for accessing the personal data we hold on you. Individuals can access the personal data we hold on them in our ChurchSuite database, and control their privacy settings, at any time through 'My Churchuite'. Access to My ChurchSuite is available to all upon request.
- Personal information will not be passed onto any third parties outside of the MKCC environment.
- Subject Consent – you will be required to verify your consent to our processing your data. MKCC will maintain records of how and when your consent was given.

- MKCC will retain personal data until such time as you withdraw your consent, we believe you are no longer associated with MKCC, or until such time as we are no longer legally obliged to do so (as in the case of child development records).