

## St Matthew's Conference Centre Limited ("the Company")

### PRIVACY NOTICE for CLIENTS & SUPPLIERS

#### Your personal data – what is it?

"Personal data" is any information about a living individual which allows them to be identified from that data (for example a name, photographs, videos, email address, or address). Identification can be by the information alone or in conjunction with any other information. The processing of personal data is governed by the *General Data Protection Regulation 2016/679* (the "GDPR") and other legislation relating to personal data and rights such as the Human Rights Act 1998.

#### Who are we?

This Privacy Notice is provided to you by the St Matthew's Conference Centre Limited ("the Company") which is the data controller for your data.

The Company is wholly owned by the PCC of St Matthew's Westminster, a registered charity and part of the Church of England. The company therefore works together with:

- the incumbent of the parish (that is, our Vicar, Fr Philip Chester)
- the bishops of the Diocese of London; and
- the London Diocesan Fund, which is responsible for the financial and administrative arrangements for the Diocese of London.

As the Company is closely associated with these persons and organisations working together, we may need to share personal data we hold with them so that they can carry out their responsibilities to the Church and our community. The organisations referred to above are joint data controllers. This means we are all responsible to you for how we process your data.

Each of the data controllers has their own tasks and a description of what data is processed and for what purpose is set out in this Privacy Notice. This Privacy Notice is sent to you by the Company on its own behalf and on behalf of each of these data controllers. In the rest of this Privacy Notice, we use the word "we" to refer to each data controller, as appropriate.

#### How do we process your personal data?

The data controllers will comply with their legal obligations to keep personal data up to date; to store and destroy it securely; to not collect or retain excessive amounts of data; to keep personal data secure, and to protect personal data from loss, misuse, unauthorised access and disclosure and to ensure that appropriate technical measures are in place to protect personal data.

We use your personal data for some or all of the following purposes (for example some of the role-holders are volunteers and no financial information will be processed for these role holders): -

- To enable us to meet all legal and statutory obligations;
- To administer the parish records;
- To maintain our own accounts and records;
- To send you communications which you have requested and that may be of interest to you.
- We will process data about you for legal, personnel, administrative and management purposes and to enable us to meet our legal obligations, for example to pay suppliers, monitor performance and to confer benefits in connection with your engagement as a supplier.

- In order to comply with legal requirements and obligations to third parties.
- Our processing also includes the use of CCTV systems for the prevention and prosecution of crime.

**What data do the data controllers listed above process?**

- Names, titles, and aliases
- Contact details such as telephone numbers, addresses, and email addresses.
- Where they are relevant to our contract, or where you provide them to us, we may process academic/professional qualifications, employment details.
- Non-financial identifiers such as passport numbers, driving licence numbers, vehicle registration numbers, taxpayer identification numbers, employee identification numbers, tax reference codes, and national insurance numbers.
- Financial identifiers such as bank account numbers, payment card numbers, payment/transaction identifiers, policy numbers, and claim numbers.
- Other operational personal data created, obtained, or otherwise processed in the course of carrying out our activities, including but not limited to, CCTV footage, recordings of telephone conversations, IP addresses and website visit histories, logs of visitors, and logs of accidents, injuries and insurance claims.
- Other data (not covered above) relating to contracts including emergency contact information; referral source (e.g. agency, employee referral); licences/certificates; employment status; billing rates, office location, practice and speciality; prior job history, employment references and personal biographies.
- The data we process is likely to constitute sensitive personal data because, as a church, the fact that we process your data at all may be suggestive of your religious beliefs. Where you provide this information, we may also process other categories of sensitive personal data: details of injuries, medication/treatment received.

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

Most of our data is processed because it is necessary for our legitimate interests. We will always take into account your interests, rights and freedoms.

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 for work supplied by you.

Where your information is used other than in accordance with one of these legal bases, we will first obtain your consent to that use.

**Sharing your personal data**

Your personal data will be treated as strictly confidential. It will only be shared with third parties including other data controllers where it is necessary for the performance of the data controllers' tasks or where you first give us your prior consent.

**How long do we keep your personal 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 and your personal data**

You have the following rights with respect to your personal data: -

When exercising any of the rights listed below, 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.

### **1. The right to access information we hold on you**

- At any point you can contact us to request the information we hold on you as well as why we have that information, who has access to the information and where we obtained the information from. Once we have received your request we will respond within one month.
- There are no fees or charges for the first request but additional requests for the same data may be subject to an administrative fee.

### **2. The right to correct and update the information we hold on you**

- If the data we hold on you is out of date, incomplete or incorrect, you can inform us and your data will be updated.

### **3. The right to have your information erased**

- If you feel that we should no longer be using your data or that we are illegally using your data, you can request that we erase the data we hold.
- 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)).

### **4. The right to object to processing of your data**

- You have the right to request that we stop processing your data. 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.

### **5. The right to data portability**

- You have the right to request that we transfer some of your data to another controller. We will comply with your request, where it is feasible to do so, within one month of receiving your request.

### **6. The right to withdraw your consent to the processing at any time for any processing of data to which consent was sought.**

- You can withdraw your consent easily by telephone, email, or by post (see Contact Details below).

### **7. The right to object to the processing of personal data where applicable.**

### **8. The right to lodge a complaint with the Information Commissioners Office.**

## **Transfer of Data Abroad**

We will take all reasonable steps to ensure that 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 in a newsletter) may be accessed from overseas. The Company uses Mailchimp for sending

emails and has agreed the data protection terms and conditions with Mailchimp providers under their Data Processing Addendum.

### **Further processing**

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

### **Changes to this notice**

We keep this Privacy Notice under regular review and we will place any updates on our website ([STMWvenue.co.uk/privacy](http://STMWvenue.co.uk/privacy)). This Notice was last updated in May 2018.

### **Contact Details**

Please contact us if you have any questions about this Privacy Notice or the information we hold about you or to exercise all relevant rights, queries or complaints at:

Email: [office@stmw.org](mailto:office@stmw.org)

Or contact: The Data Protection Officer, St Matthew's Conference Centre Limited, St Matthew's House, Great Peter Street, Westminster, London SW1P 2BU

You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.