**Data Protection Policy**

Our Data Protection contact is: Julie Hughes

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**Information Commissioner’s Office**

0303 123 1113

https://ico.org.uk/global/contact-us/email/

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

Ely Cursillo is the data controller for data held on Pilgrims1 and Cursillistas.

Cursillo is made up of a number of different organisations and office-holders who work together to deliver our mission. Ely Cursillo works together with:

* + The Bishops of the Diocese of Ely; and
	+ The British Anglican Cursillo Council, which is responsible for the financial and administrative arrangements for Cursillo nationally.

As Cursillo is made up of all of these persons and organisations working together, Ely Cursillo may need to share personal data it holds 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.

Each of the data controllers has their own tasks within Cursillo and a description of what data is processed and for what purpose is set out in this Policy.

“Personal data” is any information about a living individual which allows them to be identified from that data (for example a name, photograph, video, 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 Data Protection Bill/Act 2017, 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.

The data controllers listed above will process some or all of the following where necessary to perform their tasks:

* + Names, titles, photographs;
	+ Contact details such as telephone numbers, addresses and email addresses;
	+ Where they are relevant to their mission, they may process names, titles, photographs, telephone numbers, addresses and email addresses;
	+ Where donations are made, financial identifiers such as bank account numbers.

The data that Ely Cursillo processes is likely to constitute sensitive personal data because, as a religious organisation, the fact that it processes an individual’s data at all may be suggestive of their religious beliefs.

Ely Cursillo will comply with its legal obligations to keep personal data up to date; to store and destroy it securely; to refrain from collecting or retaining 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.

Ely Cursillo uses personal data for some or all of the following purposes:

* + To enable it to meet all legal and statutory obligations;
	+ To administer membership records;
	+ To maintain its own accounts and records;
	+ To process donations (including Gift Aid information);
	+ To seek Cursillistas’ views or comments;
	+ To notify Cursillistas of changes to our services, events and role holders;
	+ To send Cursillistas communications which they have opted into receiving and that may be of interest to them.

Most of Ely Cursillo’s data is processed because it is necessary for its legitimate interests or the legitimate interests of a third party (such as another organisation in the Church of England).

Some of Ely Cursillo’s processing is necessary for compliance with a legal obligation. For example, the Annual General Meeting.

Religious organisations are also permitted to process information about an individual’s religious beliefs to administer membership or contact details. Where an individual’s information is used other than in accordance with one of these legal bases, Ely Cursillo will first obtain their consent to that use.

Personal data will be treated as strictly confidential. It will only be shared with third parties where it is necessary for the performance of Ely Cursillo tasks or where the individual first gives their prior consent. Ely Cursillo may need to share data with some or all of the following (but only where necessary):

* The appropriate bodies of the Church of England including the other data controllers;
* The British Anglican Cursillo Council;
* Other persons or organisations operating within the Diocese of Ely.

Ely Cursillo will keep some records permanently if it is legally required to do so. It 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, Ely Cursillo will endeavour to keep data only for as long as needed. This means that it may delete it when it is no longer needed.

Electronic personal data transferred to countries or territories outside the United Kingdom will only be placed on systems complying with measures giving equivalent protection of personal rights either through international agreements or contracts approved by the Information Commissioner’s Office.

If Ely Cursillo wishes to use personal data for a new purpose, not covered by this Policy, then it 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, it will seek individuals’ prior consent to the new processing.

This Policy is reviewed every 3 years or before the 3 years is completed if there are changes to Data Protection Policy in the Diocese of Ely, following legislation changes to bring the Policy in line with such changes or as a result of an unanticipated scenario.

1Individuals who are not members of a diocesan Cursillo attending a Pilgrim Weekend event.