**23rd May 2018**

**Data Protection Policy (for all associated)**

**Belfast City Mission**

1. **Your personal data – what it is?**

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller`s possession or likely to come into such possession. We intend to comply with our legal obligations under the EU General Data Protection Regulation (“GDPR”) in respect of data privacy and security. We have a duty to notify you of the information contained in this policy.

2. **Who are we?**

We, Belfast City Mission, are the data controller. This means we determine the purpose and means of the processing of your personal data.

3. **How we process your personal data?**

We comply with our obligations under the “GDPR” by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

We will use your personal data for:

* In compliance with any legal obligation;
* To enable us to provide a voluntary service (pastoral care) for the benefit of the public in a particular geographical Mission district;
* To administer records including Membership, Leadership, Workers/Helpers and Subscribers;
* To maintain our own accounts and records (including the processing of Gift Aid applications and all financial contributions);
* To fundraise and promote the interests of the charity;
* To inform you of news, events, activities and services running at our Mission Halls or run by us or our associated organisations.

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

Is dependent upon the data subject (individual) and the purpose of the data processing. For example: the data processing for an employee in terms of what data is collected and how it is further processed is different from a member, leader, worker/helper within our Mission. Legal bases we rely on will primarily consist of one or more of the following:

* Processing is necessary for the purpose of legitimate interests pursued by us or a third party except where such interests are overridden by the interests, rights or freedoms of the data subject. This is where we need to use your data to engage in our normal weekly activities e.g. keeping a record of your contact details.
* Processing is carried out by us in our capacity as a not-for-profit body with a political, philosophical, religious or trade union aim provided: -

The processing relates only to members or former members (or those who have regular contact with it in connection with those purposes); and there is no disclosure to a third party without consent.

An example of this may be where a record of sensitive data may need to be kept by us so that effective pastoral care may be provided to those associated with the Mission.

* Explicit consent of the data subject. An example of this would be your consent to joining a mailing list so that we can keep you informed about news, events, activities, services and processing your Gift Aid donations and keeping you informed about Belfast City Mission events;
* Processing is necessary for us to comply with the law. Examples of this include our legal obligations to maintain certain records so that we may carry out our obligations under employment, social security or social protection law, or a collective agreement;
* Processing is necessary for us to protect the vital interests of a data subject that cannot physically or legally give consent. An example of this may be if we run any special needs activity.

5. **Sharing your personal data**

Your personal data will be treated as strictly confidential and will only be shared with the Belfast City Mission, Leaders and Workers/Helpers in order to carry out the purposes connected to the Mission. We will not normally share your personal data with any third party except for legal and legitimate reasons and only with your consent.

6.  **How long do we keep your personal data?**

This can vary, we will retain data while it is still current however, in some cases retention will be determined by the nature of the service or activity provided. For example Gift Aid declarations and associated paperwork for up to 6 years after the calendar year to which they relate or for example in regard to membership of an organisation or to attend a one-off activity the normal retention would be one year.

7. **Your data subject rights**

Unless subject to an exemption under the GDPR, you have rights with respect to your personal data: -

* You have the right to information about what personal data we process, how on what basis as set out in this policy;
* The right to request a copy of your personal data which we hold about you. This can be obtained through a “subject access request” (“SAR”). This request must be made in writing and forwarded to the Belfast City Mission or in regard to a particular Mission Hall through the respective Missionary or Leader concerned;
* The right to request that we correct any inaccuracies in your personal data. For example maybe it is out of date;
* You have the right to request that we erase your personal data where we were not entitled under the law to process it or it is no longer necessary to process it for the purpose it was collected;
* The right to withdraw your consent to the processing at any time. To withdraw your consent you should contact the Belfast City Mission or in regard to a particular Mission Hall through the respective Missionary or Leader concerned;
* You have the right to object to data processing where we are relying on a legitimate interest to do so and you think that your rights and interests outweigh our own and you wish us to stop;
* You have the right to object if we process your personal data for the purposes of direct marketing;
* You have the right to receive a copy of your personal data and to transfer your personal data to another data controller;
* You have the right to be notified of a data security breach concerning your personal data;
* With some exceptions, you have the right not to be subjected to automated decision-making;
* The right to object to the processing of personal data;
* You have the right to complain to the Information Commissioner. You can do this by contacting the Information Commissioner`s Office directly. Full contact details including a helpline number can be found on the Information Commissioner`s Office website ([www.ico.org.uk](http://www.ico.org.uk)). This website has further information on your rights and our obligations.

8. **Further Processing**

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

9. **Contact Details**

To exercise all relevant rights, queries of complaints please in the first instance contact Data Protection Lead David Bell at [info@belfastcitymission.org.uk](mailto:info@belfastcitymission.org.uk)