



PRIVACY NOTICE

1. Your personal data - what is it?

“Personal Data” is any information relating to an identified or identifiable natural living person, commonly referred to as the ‘data subject’. Identification can be by the information alone or in conjunction with any other information that the data controller may possess or be likely to obtain. The processing of personal data is governed by the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

2. Who are we?

The Board of The Bridge at Waterloo is the data controller for your data. This means that it decides how your personal data is processed and for what purposes. We are responsible to you for how we process your data.

3. How do we process your personal data and what is the legal basis of processing your data?

The data controllers will comply with their legal obligation 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; 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 below purposes.

As a visitor:

- To send you communications which you have requested and that may be of interest to you. These may include our newsletter, and information about campaigns, events and other fundraising activities (by email and/or hard copy);
- To process photos taken of you, with your consent, which we may use to publicise our activities;
- Our premises have CCTV cameras which capture digital images, which constitutes processing under the lawful basis of legitimate interests for security purposes;
- If you login to our wifi, we will capture information from your personal electronic device which is required as part of our terms of service;
- Our website uses cookies to capture user information which is used to optimise the service we provide to you.

As a participant in one of our events including courses:

- Where you are enquiring about or participating in one of our events such as a course or open day we will process your contact information and other personal information relating to the event for administrative purposes which constitutes processing necessary for legitimate interests;
- We may also ask your consent to collect and process sensitive data anonymously for statistical purposes.

As a user of a church building:

- Where you are enquiring about or using our buildings we will process your contact information and payment information under the lawful bases of legitimate interest, or, in cases where you hire our facilities, contractual necessity;

As a paid employee or contractor working on behalf of the Board:

- We will process your data under lawful bases of legitimate interest, contractual and legal obligations for legal, personnel, administrative and management purposes. Where we process sensitive personal data, we may rely on a number of lawful bases, including (but not limited to) your consent, or processing necessary for the purposes of exercising or performing any right or obligation relating to your employment.
- We may process sensitive personal data including, as appropriate:
 - information about your physical or mental health or condition in order to monitor sick leave and take decisions as to your fitness for work;
 - your racial or ethnic origin or religious or similar information in order to monitor compliance with equal opportunities legislation;
 - information in order to comply with legal requirements and obligations to third parties.
- We will process data relating to your work, performance, ability and suitability for the role.
- We will process your financial information and other employment related information.

As a member or trustee:

- Your contact details will be processed to enable registration and update at Companies House and or with the Charity Commission, which is processing under lawful bases of legal obligation and legitimate interests.
- We may collect and process data relating to your ability and suitability regarding the trustee role as part of our due diligence, which is processing under the lawful basis of legitimate interests.

As a person requiring a Disclosure and Barring Service (DBS) check due to working with children or vulnerable adults:

- Your contact details and any other relevant documents as required for a DBS check will be processed under the lawful bases of legitimate interests, and processing necessary for the safeguarding of children and of individuals at risk.

In addition to the above, the data we process may constitute sensitive personal data if your role with TBAW arises ex officio from your role with St John's or if you have been nominated by the PCC of St John's. In these circumstances 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 sensitive personal data.

In circumstances where your personal data is used on the basis of obtaining your consent, you may indicate your consent in a number of ways, including, as permitted by law, ticking a box (or equivalent action) to indicate your consent.

4. Sharing your personal data

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

It is likely that we will need to share your data with some or all of the following (but only where necessary):

- Staff or Volunteers of TBAW or St John's Waterloo in order to carry out a service where it is in the legitimate interest of TBAW. For example, sharing contact details to facilitate training or mentoring;
- Our agents, servants and contractors. For example, we use third parties to process our payroll and our DBS checks and we may also ask a commercial provider to send out newsletters on our behalf, or to maintain our database software;
- As a trustee or member your contact details will be shared with Companies House and or the Charity Commission.
- In accordance with our Diocesan Safeguarding Policy "A Safe Church" personal data relating to safeguarding may be shared confidentially between the TBAW Safeguarding Officer and the Diocesan Safeguarding team.
<http://southwark.anglican.org/safeguarding/diocesan-policies-and-procedures>

5. How long do we keep your personal data?

We keep data in accordance with the guidance set out in the guide "Save or Delete: the Care of Parish Records" which is available from the Church of England website at <https://www.churchofengland.org/more/libraries-and-archives/records-management-guides>. We will only keep data for as long as we need it, however we may keep some records permanently if we are required to do so.

Where we no longer need to process your personal data for the purposes set out in this Privacy Notice, we will delete your personal data from our systems.

6. Your rights and your personal data

To exercise your rights, please send your request to us in writing (using the contact details below). When exercising your 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:

- The right to access information we hold on you
- The right to correct and update the information we hold on you
- The right to have your information erased: *In the case that you request that we erase the data we hold, we will confirm whether the data has been deleted or the reason why it cannot be deleted (e.g. because we need it for our legitimate interests or a regulatory purpose).*
- The right to object to processing of your data.
- The right to data portability.
- The right to withdraw your consent to the processing at any time for any processing of data to which consent was sought.
- The right to object to the processing of personal data where applicable.
- The right to lodge a complaint with the Information Commissioner's Office.

7. Transfer of Data Abroad

Any electronic personal data transferred to countries or territories outside the European Economic Area (EEA) 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 may be accessed from overseas. We take all reasonable steps to ensure that your personal data is processed securely and will only transfer your personal data outside the EEA where it is compliant with applicable data protection legislation and the means of transfer provides adequate safeguards in relation to your personal data.

8. Further processing

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

9. 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: The Data Controller, The Bridge at Waterloo, St John's Church, 73 Waterloo Rd, Lambeth, London SE1 8TY, or email: bridgeadmin@stjohnswaterloo

If you are unhappy with how your personal data has been processed, you have the right to lodge a complaint with the Information Commissioners Office at any time. You can contact the Information Commissioners Office on 0303 123 1113 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.