

# **Data Retention Policy**

## Other related policies and documents:

- Privacy and Data Protection Policy
- Data Update Procedure

## **General policy statement**

The King's Church, Wisbech is committed to respecting the privacy of individuals and ensuring the personal information that has been entrusted to us is processed in accordance with the Data Protection Act (DPA) 1998 and General Data Protection Legislation (GDPR) 2018.

# **Definitions used in this policy**

**Data Subject:** the individual whose data we hold or use (eg. A full church member, someone who has attended a course or event, someone who has filled in a card asking to be kept informed about the church and its events). A person becomes responsible for their own data at 13 years of age.

Data Controller: The King's Church, Wisbech (us).

**Data Processor:** this is any third party which process data on behalf of the Data Controller. (eg. Church Insight website and church management platform (part of Endis Limited)).

#### **Financial Data**

As a registered UK charity we have a legal obligation to disclose the financial information of a Data Subject who has chosen to add Gift Aid to their donation to HMRC.

As such the church is legally obliged to retain personal and financial information provided by a Data Subject until the close of the current tax year upon which the church Treasurer will make the Gift Aid application to HMRC.

If a Data Subject continues to attend the church their data will continue to be held and used for Gift Aid purposes in forthcoming years.



If a Data Subject has not been attending the church for 1 year from the date of their last contribution their personal and financial data will be destroyed after it has been submitted to HMRC at the close of that current tax year.

## **DBS Checks**

We will retain DBS checks if the Data Subject to whom it refers is still actively working with children within one of our church ministries or until it expires. If it expires whilst the Data Subject is still working with children and vulnerable adults for our church we will get an updated copy.

If the Data Subject no longer works with children in one of our ministries or has left the church, we will destroy their DBS check within 1 year of their departure.

## **General Church Database and Paperwork**

A Data Subject's personal information will be kept on the church database throughout the time that person is actively attending church, unless they activate their right to withdraw that information (see Data Subject's Rights below).

If a Data Subject does not come to church for 1 year their data will be deleted and destroyed and login access to the website will be revoked. This includes destroying all physical documents which contain their personal information.

To keep the information we hold current and up-to-date there will be a yearly review where current Data Subjects whose information is on our database will be reminded that we hold their data and to inform us of any changes. Periodically Data Subjects will be informed of all their currently held data and they will be asked to make any corrections to this and to make any revisions to the permissions they have consented to. (See Data Update Procedure)

## **One-Off Events / Courses**

A Data Subject who has signed up to attend a one-off event or course (something that is not run weekly or monthly) and is not a current church attender will have their personal details deleted and destroyed 1 month after the completion of the course / event.

They will be given an opportunity to register interest in another forthcoming course or indeed be invited to join the general church database for regular attenders (if they start attending regularly).



# **Data Subject's Rights**

GDPR gives Data Subjects the right to:

- Request in writing and securely obtain copies of the personal information The King's Church, Wisbech holds about them which we will give to the Data Subject concerned within 1 month.
- Correct or update their personal information held by us at any time. This can be done
  by a Data Subject if they have login access to our website in the 'My Area' section.
  Or by contacting the church office and their data will be updated as soon as possible
  (within 1 month).
- Object to the use of their personal information for certain things (eg. Emailing you
  about a forthcoming course or event, but you may wish to still receive the emailed
  newsletter). Preferences will be updated once we receive a written request to do so
  and these will take effect as soon as possible (within 1 month).
- Request The King's Church, Wisbech to stop using their personal information at any time. Upon receipt of a written request we will delete all data held on a particular Data Subject as soon as possible (within 1 month) and all communication will stop at this time.