YR EGLWYS _{yng}NGHYMRU



CHURCH IN WALES

ELECTORAL ROLL PRIVACY NOTICE

Who are we?

[THE PAROCHIAL CHURCH COUNCIL/MINISTRY AREA COUNCIL OF...] is the data controller (contact details below). This means it decides how your personal data is processed and for what purposes.

Why do we process your personal data?

We use the personal data you provide on the electoral roll application form to enable us to manage, maintain and publish the electoral roll in accordance with the Constitution of the Church in Wales and in particular:

- to determine eligibility for attendance and participation at the Annual vestry meeting and for election to the [Parochial Church Council/Ministry Area Council], deanery and diocesan conferences and the Governing Body (and related committees thereof) where applicable;
- to calculate the number of representatives who may be elected to various regional and national bodies of the Church in Wales;
- to undertake a review and revision of the electoral roll as necessary; and
- to publish the name of members of the roll (to ensure accuracy), by exhibiting the roll in the parish church, in accordance with the provisions of the Constitution of the Church in Wales.

What is our lawful basis for processing your personal data?

1. Data Processing for the purpose of determining eligibility and creating or revising the electoral roll is carried out under the Constitution of the Church in Wales. The Church needs to process certain data to ensure that those persons eligible (and only those persons) are able to take part in the administrative and synodical life of the Church.

It is necessary for the Church to process your Personal Data provided for the Electoral Roll to accommodate these procedural elements of the Church's management and operation, such as choosing office holders and maintaining the Electoral Roll. These tasks relate solely to members of the Church of Wales in connection with its purposes, as set out in more detail above. The authority to process such data is found in Article 6(1)e UK GDPR (Public Task).

2. The placing of a data subject's name on the Electoral Roll, insofar as it reveals their religious beliefs, will cause the Personal Data concerned to be classified as Special Category data. Consequently, processing such data would require, in addition to the usual lawful basis of Public Task, a further 'condition' under Article 9 UKGDPR.

Such processing under Article 9 would occur under the provisions of 'substantial public interest' pursuant to Schedule I. Part 2. Para 6 (1)b and Schedule I. Part 2. Para 6(2)a.

3. Any member of the Church in Wales is entitled to appeal that any person on the electoral roll is not qualified to be so entered; such a provision requires a means of discovering who is and is not on the roll. It is clearly in the public interest that the Church is managed properly and adheres to the requirements of the constitution. Therefore, part of our statutory function under data protection law is to organise such a mechanism to make the names on the electoral roll available for inspection by members of the Church in Wales for this purpose.

Sharing your personal data

Your personal data will be shared within the institutional Church in Wales and your name (and membership of the roll in this parish) will be shared with any member of the Church in Wales who makes a request to inspect the electoral roll.

How long do we keep your personal data?

We keep your personal data whilst you remain on the roll and for a period of 6 years after you cease to be on the roll. You can be removed from the roll at any time by application. In 2022 (and every fifth year after that) the roll is revised and you will be automatically removed from the roll unless you re-apply.

Your rights and your personal data

Unless subject to an exemption you have the following rights with respect to your personal data:

- The right to be informed that processing is taking place.
- The right to access a copy of the personal data which we hold about you;
- The right to rectification of any personal data found to be inaccurate or out of date;
- The right to request your personal data be erased where it is no longer necessary for us to retain such data;
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request that a restriction is placed on further processing;
- The right to complain to the Information Commissioners Office. (Details below)

There are certain other data protection rights which are not applicable to this type of processing.

For the avoidance of doubt, the Church will not use your data supplied for the Electoral Roll on our own behalf or through a third party for marketing purposes, automated decision making or profiling and we do not rely on the lawful basis of Legitimate Interest.

Contact Details

For further details of how we process your personal data please contact [_____] (Minister/Churchwarden/Data Protection Administrator) [insert email or postal address].

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