Data Protection Policy
Irish Methodist
World Development & Relief
The Methodist Church in Ireland

PRIVACY NOTICE

Data Protection Principles
Irish Methodist World Development & Relief complies with the General Data Protection Regulation (GDPR) as implemented in May 2018. We aim to ensure that, when processing information belonging to individuals we will use that data with integrity, appropriately, and sparingly. We will endeavour to ensure such data is accurate, not kept forever, and stored securely. Training in data protection is recommended for all our staff and volunteers who store and/or use people’s information. We will post this Privacy Notice in our buildings and on our website. We will review this policy every three years.

Your Rights
You have data protection rights that you can exercise over the information you give us. These rights include: to be informed how your data is being used; to have access to the information we hold about you; to have inaccuracies corrected; to have your information erased; to object to or restrict the ways we process your information, and; data portability (to receive your digital information in a useful format). There may be some legal restrictions on these rights, which we will explain as appropriate. If you feel your rights haven’t been upheld please contact us in the first instance, or you can communicate with the Methodist Church in Ireland (Secretary of Conference) at Edgehill House, 9 Lennoxvale, Belfast, BT9 5BY.

Our Contact Details
If you need to get in touch with us please contact:
World Development Officer at World Development & Relief, Edgehill House, 9 Lennoxvale, Belfast, BT9 5BY
Phone: 028 90 767969
E-mail: worlddevelopment@irishmethodist.org

Your Data
We may record and process some or all of the following personal information about you:

- contact details (address, phone numbers, e-mail address)
- date of birth
- photographs/video recordings
- financial giving to WDR & essential bank details
- religious beliefs
- health and medication
- passport details

If you are a supporter or volunteer we use this data so that we might:

- keep you informed about the work of World Development & Relief and its partners e.g. by sending you occasional notices by post, e-mail, phone call or text message
• make you aware of opportunities to engage with the work of WDR and its partners e.g. by sending you occasional notices by post, e-mail, phone call or text message
• encourage you to support WDR and its partners financially e.g. by sending you occasional notices by post, e-mail, phone call or text message
• connect you with other supporters with a specific common purpose e.g. WhatsApp group for teams travelling together overseas

If you are a development partner we use this data so we might:

• Manage the transfer of funds, share information and monitor and evaluate project work e.g. by sending you occasional notices by post, e-mail, phone call or text message

Legal Bases for Processing
Our legal bases for processing your data are ‘legitimate interests’ (for activities related to the everyday functioning of WDR.) [GDPR Article 6.1(f)] and ‘consent’ (for everything else) [Article 6.1(a)]. In a small number of instances we rely on ‘contract’ (for example, if we are your employer) and ‘legal obligation’ (for example, in relation to safeguarding issues).

When using ‘legitimate interests’ as the legal basis for using the information you have given us we will ensure it is for a genuine purpose, necessary for the smooth running of WDR, and not invasive to your privacy. For all other purposes we will ask for your positive consent before processing your details.

We are able to process ‘special categories of personal data’ (such as your health or religious beliefs) in the course of our legitimate activities because we are a not-for-profit body with a religious aim relating to you as a member, former member, or person with whom we have regular contact [Article 9.2(d)].

Sharing Your Data
Only people appointed to specific roles within WDR (for example, staff and appointed officers) can access your details, and what they can see is limited to what they need in order to carry out their role.

If you are appointed to a specific role within WDR we may publish your details (eg in announcement sheets, annual reports or our web presence) or share them directly so members and other relevant individuals/organisations can contact you. This will cease when you step down from the role.

We occasionally post photographs and/or video taken at WDR events on our website (www.methodistworlddevelopment.org) and/or other online platforms (Facebook, Twitter, Youtube & Vimeo).

If you donate money to us using the UK Gift Aid scheme we will send details of those gifts to HMRC. If you donate money to us using the Irish Charities Donations Scheme we will send details of those gifts to the Revenue Commissioners.

We will not share your information with any other third parties without your permission unless we have a legal obligation to do so. However, we may need to share your details within the Methodist Church in Ireland, as follows:

• to comply with our Safeguarding policy when you volunteer with children and vulnerable adults.
• if your role within WDR means you need to receive specific information related to that role.
• to process Gift Aid tax refunds through the Trustees of the Methodist Church in Ireland.
Security and Retention

- We use Microsoft Office 365 cloud services for digital files, which have integrated appropriate security measures to keep your data safe, including instances where their servers are located outside of the EEA.
- To prevent unauthorised disclosure of your information, our paper-based records are kept in a locked cabinet when not in use. Electronic and portable memory devices are protected by passwords or equivalent security measures. Membership software and digital documents containing personal data are either encrypted or password-protected.
- Other than our permanent records (WDR Committee meeting minutes) or details that need to be kept for legal compliance (such as Safeguarding notes or Gift Aid declarations), we will remove your information from our systems up to six after your last personal contact with us (or after you turn eighteen years old if you are a minor).
- One-off consent forms (such as for trips) will be destroyed/erased one year after their use.

Subject Access Request

You have the right to ensure our use of your data is lawful, and that the data we hold is accurate. If you would like to access the data we process about you, please write to us at:

World Development Officer
World Development & Relief
Edgehill House
9 Lennoxvale
Belfast
BT9 5BY

E-mail: worlddevelopment@irishmethodist.org

In order to locate the information you are requesting and to ensure proof of your identity, please send us:

- Your name (including any names by which you used to be known) and Date of Birth
- Address (incl postcode), e-mail address(es), telephone number(s)
- Two pieces of identification that between them clearly show your name, date of birth and current address (eg passport, photocard driving license, birth certificate, recent bank statement/utility bill)

In response, and within one month at the latest, we will send to you:

- The personal data we hold on record for you
- The types of processing we do with your data
- The people/groups with whom your data will have been shared (or will be in the future)
- Our intentions regarding how long we might store your data
- OR our reasons for not providing your data

We will not charge for this service unless you make multiple requests within a short space of time.

Further Information

You can learn about Data Protection principles, your rights, and more – including making a complaint about our handling of your data – from the Information Commissioner’s Office (ICO) in Northern Ireland [visit www.ico.org.uk, call 0303 123 1113 or write to the Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF] and the Data Protection Commissioner (DPC) in the Republic of
Ireland [visit www.dataprotection.ie, call (0761) 104 800 or write to The Data Protection Commissioner, Canal House, Station Road, Portarlington, Co. Laois R32 AP23]. Guidance for Methodist churches is available at www.irishmethodist.org/data-protection-resources [short link: http://bit.ly/DPresources].
GUIDELINES FOR DATA PROCESSORS

Am I a Data Processor?
Everyone who gathers, stores or uses personal information on behalf of WDR is considered to be a ‘data processor’. If you are a data processor it is your responsibility to help WDR comply with the GDPR by implementing this Data Protection Policy. In so doing, you will not only keep people’s information safe and secure but you will also help them to use their rights and protect WDR from the reputational damage (and potentially, fines) that could be caused by a data protection breach. If you have not yet completed data protection training, please speak with the WDR Convenor and visit the Data Protection Resources page on the Methodist Church in Ireland website (http://bit.ly/DPresources).

An A-Z list of suggested solutions to common issues is also available on the Data Protection Resources page of the Methodist Church in Ireland website.

What Do I Need to Understand?

If any of the following terms and concepts are unfamiliar to you, it’s a sign that you need some training!

- Principles of data protection
- Privacy rights of data subjects
- Procedures for:
  - Subject Access Requests
  - Breach Notifications
- Using Privacy Notices and Consent

We want to treat individuals with integrity, so they ought not to be surprised by how you have their information, nor by the way you use it or who else might have access to it. Thank you for the work you do!
SUBJECT ACCESS POLICY
As a Data Controller, WDR must respect the privacy rights of individuals. These include the right to access, free of charge, the data you hold about them in order to verify the lawfulness of your processing; and then to have that data rectified or erased, or to object to or opt out of the types of processing you carry out.

The supply of such data should take place no longer than one month from the time of the request (ideally much more quickly), and in a format that is easily readable (whether physical or digital) by the individual. The individual can also request disclosure orally (for example on the telephone) but you must be confident of their identity and can request proof if you are unsure.

There are some occasions when requests may be denied, listed here:

- When disclosing the subject’s data could adversely affect the rights or freedoms of others
- When the identity of the data subject cannot be adequately verified
- When the enquirer is seeking data belonging to another person (other than their own children under the age of 18)

When you receive a ‘subject access request’ (which doesn’t have to be described as such, it could just be a question such as, “what information do you hold about me, and what do you do with it?”) you must respond within a month by sending in writing:

- The personal data you hold on record for them
- The types of processing you do with their data
- The people/groups with whom their data will have been shared (or will be in the future) – for instance if their details have been passed to other parts of the Methodist Church in Ireland
- Your intentions regarding how long you might store their data (see ‘Security and Retention’ in your Data Protection Policy)

You should also make the individual aware of their rights to:

- Request rectification or erasure of their data, or the restriction or cessation of processing of the same (but not including their removal from historical records such as baptism registers etc)
- Make a complaint to the Secretary of Conference at 1 Fountainville Avenue, Belfast BT9 6AN or secretary@irishmethodist.org