

# **Greek Orthodox Church**

of Saint Peter & Saint Paul in Bristol



## **Greek Orthodox Community of Bristol (Charity no. 279079)**

### **Privacy Notice**

#### **Introduction**

The Greek Orthodox Community of Bristol (Charity no. 279079) serving the Greek Community in Bristol and beyond is made up of Greek Orthodox Church of Saint Peter & Saint Paul, Hellenic School of St Peter & St Paul, Library, Auxiliary Services of St Tabitha and community events. The Community Hall is run separately as a Community Interest Company.

This document is for you, if you are a member of the Greek community future, past or present.

#### **What is the purpose of this document?**

The Greek Orthodox Community of Bristol is committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information about in accordance with the General Data Protection Regulations (GDPR).

The Greek Orthodox Community of Bristol is the "data controller." This means that we are responsible for deciding how we hold and use personal information about you. Andreas Nicolaou, Treasurer is responsible for Data Protection within the Greek Orthodox Community of Bristol.

The Hellenic School of St Peter & St Paul is a Greek Education Centre where students can progress and complete Greek GCSE and A levels. It is an approved exam centre. It employs part time teaching staff and assistants as well as additional support from volunteers. The Head teacher is appointed by the Cyprus Educational Authority (KEA).

All interested persons wishing to be part of the community can join the Greek Orthodox Community of Bristol Charity Trust.

This notice explains to you what decisions we have taken in relation to personal information we hold about you as a member of the Greek Orthodox Community of Bristol.

Data subjects include:

- Trustees
- Minister
- Committee members
- Charitable Trust members
- Teaching staff and volunteers – please see separate privacy notice
- Parishioners

We encourage you to read this notice carefully, together with any other privacy notices we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information. We may update this notice at any time.

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### **Data protection principles**

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes
3. Relevant to the purposes we have told you about and limited only to those purposes
4. Accurate and kept up to date
5. Kept only as long as necessary for the purposes we have told you about
6. Kept securely

### **The kind of information we may hold about you**

Depending on the circumstances, we may collect, store, a variety of categories of personal information about you. Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

Personal information we may hold includes the following:

- Data collected through the membership form - name, address and contact details, including email address and telephone number
- Receipt Books - names and addresses of donators
- Formal ecclesiastical record of birth, marriage, deaths
- Name of school, parental responsibility contact details, identification/passport/health information/any other relevant information disclosed by its members
- Pupil assessments, safe guarding and child protection forms, parents and pupil registers, DBS records
- Financial information (where you are purchasing goods or services from us) including bank details and contact details
- Parishioners register – name, addresses (separate register for those now living outside the UK)
- Committee meeting notes of meetings, papers, action plans and other community correspondence
- Community meetings minutes including school and auxiliary society

A separate privacy notice is available for employees and volunteers

### **How may your personal information be collected?**

We collect this information in a variety of ways including directly from you or from third parties where you have provided consent for your data to be passed to us. We will also collect additional personal information in the course of you using our services.

All personal data will be stored in our secure IT system and in the case of paper records, in lockable cabinets.

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## **How we may use information about you**

We will only use your personal information when the law allows us to. Most commonly, we may use your personal information in the following circumstances:

1. Where we are taking steps at your request prior to entering into a contract
2. Where we need to perform a contract which we have entered into with you
3. Where we need to comply with a legal obligation.
4. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests

We may also use your personal information in the following situations, which are likely to be rare:

5. Where it is necessary to protect the vital interests of you or another person
6. Where it is needed in the public interest or for official purposes.

## **Situations in which we may use your personal information**

Most of our data processing is carried out as a legitimate interest by a not-for-profit body with a religious 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

We use this personal information to:

- To enable us to provide a voluntary service for the benefit of the public in a particular geographical area as specified in our constitution
- To administer membership records
- To provide educational services
- To fundraise and promote the interests of the charity
- To manage our employees and volunteers
- To maintain our own accounts and records (including the processing of gift aid applications)
- To inform you of news, events, activities and services running in Bristol
- To share your contact details with the Archdiocese of Thyateira and Great Britain, so they can keep you informed about news and events, activities and services that will be occurring in the diocese and in which you may be interested.
- To deal with enquiries and complaints made by or about you

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Processing is also necessary for carrying out legal obligations in relation to Gift Aid or under employment, social security or social protection law, or a collective agreement.

### **Change of purpose**

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

We may process your personal information without your knowledge or consent where this is required or permitted by law.

### **Who has access to your data?**

Your personal data will be treated as strictly confidential information and will only be shared with other members of the church in order to carry out a service to other church members or for purposes connected with the church.

We will also share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

The Greek Orthodox Community of Bristol may share your data with following third parties:

- KEA (Cyprus Educational Authority)
- Archdiocese of Thyateira and Great Britain
- Educational services: Examination board – Edexcel (Pearson), Ellinomathia, [www.gsae.edu.gr](http://www.gsae.edu.gr)
- Professional advisers, HR Consultant (Louise Smith HR Ltd), lawyers, bankers, accountants (Larkos & Partners) and insurers based in the United Kingdom.
- For gift aid purposes: HR Revenue & Customs, regulators and other authorities based in the United Kingdom

In addition, we may disclose your personal information:

- in connection with any legal proceedings or prospective legal proceedings
- in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk)
- to any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers

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to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

The Greek Orthodox Community of Bristol does not share your data with other companies or organisations to enable them to send their own marketing communications to you.

If you require further information with regards to your personal data which may be shared with third parties, please contact Andreas Nicolaou.

### **Security of your personal information**

The Greek Orthodox Community of Bristol have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We will store all the personal information you provide on our secure (password- and firewall-protected) servers. Of course, data transmission over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

In addition, we limit access to your personal information to those employees, contractors and other third parties who have a business need to know. They may only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have also put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

### **Data retention**

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. We will retain and securely destroy your personal information in accordance with applicable laws and regulations. Details regarding specific retention periods of personal data can be provided on request. Please contact Andreas Nicolaou with any specific queries.

### **Your duty to inform us of changes**

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

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## Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below)
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please write to Andreas Nicolaou.

## No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if:

- your request for access is clearly unfounded or excessive
- you request further copies of your data following a request

## What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

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## **Right to withdraw consent**

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please write to Andreas Nicolaou.

Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

## **Changes to this privacy notice**

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about data protection or this privacy notice, please contact:

Andreas Nicolaou, Treasurer, Greek Orthodox Church

Postal address: Church Offices, 44 Berkeley Road, Westbury Park, Bristol, BS6 7LP

Tel: 0117 951 0500

Email: [Kanoni67@gmail.com](mailto:Kanoni67@gmail.com)

Website: <http://www.greekcommunitybristol.org.uk>

## **Complaints to the ICO**

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.