

NEW LIFE CHURCH



Data Protection and Privacy Policy

Data Controller details

Data Controller: New Life Church (New Life Church (Guernsey) LBG).

Charity number: CH78

Church address: Carmel Chapel, Route Des Bordages, St Saviour, Guernsey. GY7 9FJ

Data Protection Lead: Tim Langlois

Email: operations@newlifechurch.gg

Phone: 07839 702600

This policy first adopted: 26th March 2026

This policy due for review: 26th March 2027

This is the privacy statement and data protection policy for New Life Church (New Life Church (Guernsey) LBG). It covers how we will process (use and store) your data, what data we hold, your individual rights and how you can interact with us about your data.

This policy covers our use of **personal data**, which is any information about a living individual which allows them to be identified from that data (for example a name, photograph, video, email address, or postal address). Identification can be by the information alone or in conjunction with any other information.

Our **processing of personal data** is governed by the Data Protection (Bailiwick of Guernsey) Law, 2017.



How is your data used and processed?

New Life Church processes data including:

- Names, titles, and aliases.
- Contact information including telephone numbers, postal /residential addresses, and email addresses.
- Where there is a legitimate interest to facilitate our charitable aims and activities, or where you have added them to our database or provided them to us, we may process demographic information such as gender, age, date of birth, marital status, nationality, and dependants.
- Where you give financially in support of New Life Church or pay for church activities (event bookings, etc.).
- As a church (religious organisation), the data we process is likely to constitute sensitive personal data such as safeguarding, health, criminal record information.

As a Data Controller, New Life Church will comply with its legal obligations 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, and 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.

If you have any concerns about how your data is being used, please speak with our Data Protection Lead.

What are we doing with your data?

We only hold data that either we are legally obliged to or that helps us fulfil our missional and charitable aims as a church. We are a membership organisation and good communication with our membership, and others who have provided their data for other purposes, is an essential part of being church.

Therefore, we will securely hold and process data to:

- Enable us to meet all legal and statutory obligations.
- Comply with and facilitate our comprehensive safeguarding procedures (including due diligence and complaints handling) in accordance with best safeguarding practice with the aim of ensuring that all children and adults-at-risk are provided with safe environments.
- Deliver our Church's mission and to carry out any other voluntary or charitable activities for the benefit of the public as provided for in the constitution and statutory framework of our church.
- Administer our membership records.
- Enable us to follow up membership, course and event enquiries.
- Maintain our own accounts and records.
- Process and record financial donations that you have made and where applicable our engagement with States Revenue Services for the States Income Tax charity relief scheme.
- Communicate with you about our services, events, meetings, mission and other matters which are relevant to you as part of our church community.



Security of personal data

We take appropriate technical and organisational measures to keep personal data secure. These include:

- Limiting access to data to those who need it for their role
- Using passwords and, where possible, multifactor authentication on systems
- Locking paper records in secure cabinets when not in use
- Encrypting or passwordprotecting portable devices where data is stored

Suspected data breaches must be reported promptly to the Data Protection Lead so that we can investigate and, where required, notify the ODPA and affected individuals without undue delay.

Financial Records and Controls

We take appropriate technical and organisational measures to keep financial data secure. These include:

- Storing financial records securely on ChurchTrac, incorporating encryption and secure backups.
- Processing donation data in line with accounting, auditing and tax reporting requirements.
- Retaining financial records for a minimum of 7 years as per Revenue Services requirements for audits.
- Limiting access to financial data to the Treasurer and finance team. Access being restricted based on role.
- Ensuring any use of any electronic payment systems and storage comply with security standards (password protection, encryption, restricted access etc).
- Any sharing with third party auditors, tax authorities or payment processors is strictly limited to what is legally required and logged for accountability.
- Any communication about donations or fundraising will only be sent with explicit consent or legitimate interest. Opting out will be easy and immediate.

Photos, Video and online presence

We may take photos or videos at services and events for internal records or to share church life on noticeboards, printed materials, the website or social media.

Where individuals are clearly identifiable, we will:

- Explain how photos or videos may be used
- Seek consent where required, particularly for children and adults at risk, and provide simple ways to opt out or request removal
- Avoid using full names alongside images of children in public materials.

For online services or live-streaming, we will display clear notices and provide seating options outside the main camera view where reasonably possible.



What is our legal basis for processing your personal data?

We will only process personal data where a lawful basis under the Law applies. Depending on the context, we rely on:

- Consent: e.g. to send email newsletters; to use identifiable photographs.
- Contract: e.g. employment or engagement contracts.
- Legal obligation: e.g. safeguarding records, financial and tax records, health and safety requirements.
- Vital interests: e.g. disclosing medical information to emergency services where a person's life or health is at risk.
- Public interest / official authority: where we carry out tasks in the public interest or exercise recognised charitable functions.
- Legitimate interests: e.g. managing groups and rotas, basic pastoral administration, protecting the Church's property and reputation, provided individuals' rights are not overridden.

For routine church administration, safeguarding and pastoral work, we normally rely on legitimate interests or legal obligation rather than consent, so that protection is not dependent on consent being withdrawn.

Where your information is used other than in accordance with one of these legal bases, we will first obtain your consent to that use.

Will we share your data?

You can be reassured that we will treat your personal data as strictly confidential and only share it where there is a lawful basis and a genuine need to know.

Our primary database is ChurchTrac and is only accessible by those holding leadership roles within the church using individual logins with secure passwords.

With your consent, basic contact details of church members can be made available to other church members via a dedicated portal of the database / via church directory.

Data will only be shared with third parties where it is necessary for the performance of our tasks or where you first 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):

- Our agents, servants and contractors. For example, if we utilise commercial providers to send out newsletters on our behalf, or to maintain our database software.
- On occasion, other churches with which we are carrying out joint events or activities. In this regard, sharing data is strictly limited to necessary information and governed by agreements.



How long will we keep your personal data?

Our general rule is to keep data no longer than necessary. Where you continue to actively engage with our church services, activities and events, we will retain the appropriate data for you so that we can best serve your involvement. We operate an annual process of review, by which we assess who is actively engaging in church life, and where this is not the case, we will remove your data accordingly by deleting it from the database and shredding any paper records. Unless specifically requested the removal of personal data will not extend to editing photographs/videos that have been taken for internal records or to share church life on noticeboards, printed materials, the website or social media.

Additionally:

- We will keep some records permanently if we are legally required to do so. For example, this covers wedding registers and some safeguarding records.
- We may keep some other records for an extended period. For example, it is current best practice to keep financial records for a minimum period of seven years to support Revenue Services audits.

Data review and audits

This Policy will be reviewed at least annually, or sooner if there are significant changes to the Law, ODPA guidance, or to the Church's activities, especially those involving children and online services.

The annual data review will include memberships, donations and personal data. Items removed will be documented together with reasons.

Internal auditors or independent accountants may review financial and membership data to ensure accuracy, retention and compliance.

What are your rights regarding your personal data?

You have the following rights with respect to your personal data: When exercising any of the 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.** At any point you can contact us to request the information we hold on you as well as why we have that information, who has access to the information and where we obtained the information from. Once we have received your request, we will respond within one month.
- **The right to correct and update the information we hold on you.** If the data we hold about you is out of date, incomplete or incorrect, you can inform us and your data will be updated.
- **The right to have your information erased.** If you feel that we should no longer be using your data or that we are illegally using your data, you can request that we erase the data we hold. When we receive



your request, we will confirm whether the data has been deleted or the reason why it cannot be deleted (for example because we need it for our legitimate interests or regulatory purposes).

- **The right to object to processing of your data.** You have the right to request that we stop processing your data. Upon receiving the request we will contact you and let you know if we are able to comply or if we have legitimate grounds to continue to process your data. Even after you exercise your right to object, we may continue to hold your data to comply with your other rights or to bring or defend legal claims.
- **The right to withdraw your consent to the processing at any time for any processing of data to which consent was sought.** You can withdraw your consent easily by telephone, email, or by post.
- **The right to lodge a complaint with the Data Protection Commissioner** who may be contacted at Office of the Data Protection Commissioner, Block A, Lefebvre Court, Lefebvre Street, St Peter Port, Guernsey, GY1 2JP. T: 01481 742074. E: info@odpa.gg.

Further processing

If we wish to use your personal data for a new purpose not covered by this policy, then we will provide you with a new policy prior to commencing the processing to explain this new use and set out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

Roles, responsibilities and training

The Church's governing body (Directors/Elders) has overall responsibility for compliance with data protection law.

They can appoint a Data Protection Lead (DPL) to oversee day-to-day compliance, maintain registers and logs, and act as the main contact for data protection queries and incidents.

All staff and volunteers who handle personal data must:

- Read and follow this Policy and any related procedures
- Attend data protection and safeguarding training as required
- Only access and use personal data needed for their role
- Report any concerns or possible breaches without delay.

You are very welcome to get in contact with US...

If you have any queries or concerns about how we use your data, please do get in contact with us. Our Data Protection Lead and their contact details are given on the first page of this document.