



## DATA PROTECTION POLICY

### 1. INTRODUCTION AND SCOPE

- 1.1. This is the data protection policy (the **Policy**) of St Clement's Parish Church (the **Church**).
- 1.2. The Church is committed to protecting and respecting individual privacy. The purpose of this Policy is to ensure that the Church complies with the Data Protection (Jersey) Law 2018 governing the use of information relating to natural living persons.
- 1.3. This Policy may be supplemented by guidelines where appropriate and may be updated from time to time.

### 2. TERMS

- 2.1. This Policy uses the following defined terms:

**Data Protection Officer** means the Rector or their nominated deputy.

**Data Subjects** means individuals whose Personal Data the Church Processes in the course of its activities, including members of the Church congregation, members of the municipality of the Parish of St Clement and the Deanery of the Island of Jersey.

**Personal Data** means information that:

- relates to an identified or identifiable natural living person; and
- is held either (i) on computer or in other electronic or automatically Processed form; or (ii) in a paper filing system arranged to be accessible according to specified criteria.

**Processing** means collecting, storing, analysing, using, disclosing, archiving, deleting or doing anything else with Personal Data (and **Process** and **Processed** should be read accordingly).

**Church Officer** means any person who Processes Personal Data for and on behalf of the Church, including the Rector, Churchwardens, Almoners, Treasurer, Covenant Officer, Curates and the Church administrator.

### 3. DATA PROTECTION COMPLIANCE

All Church Officers must comply with this Policy.

### 4. THE DATA PROTECTION OFFICER

- 4.1. Queries in relation to this Policy or data privacy issues generally should be directed to the Data Protection Officer in the first instance, by email to [stclementjersey@outlook.com](mailto:stclementjersey@outlook.com)
- 4.2. The Data Protection Officer is responsible for the oversight of the Church's Processing of Personal Data and ensuring that an appropriate record of that Processing is maintained.
- 4.4. If a Church Officer believes that the Church may not have complied with this Policy, they should inform the Data Protection Officer as soon as practicable.

- 4.5. If a Church Officer is in doubt as to the requirements of the Policy in any particular case, they should consult the Data Protection Officer.

5. **TRANSPARENCY**

The Church will ensure that a suitable privacy notice is made available to Data Subjects. The notice is to be provided in writing, in a concise, transparent, intelligible and easily accessible form, using clear and plain language.

6. **FAIRNESS, LEGITIMACY AND PROPORTIONALITY**

- 6.1. The Church will only Process Personal Data fairly and for specified purposes. The Church will not Process Personal Data which is irrelevant or goes beyond what is necessary given the purposes of the Processing.
- 6.2. Having collected Personal Data for a particular purpose, the Church will not Process that Personal Data in a way which is incompatible with that purpose without notifying the Data Subject.

7. **INTERNATIONAL DATA TRANSFERS**

The Church will not transfer Personal Data outside of Jersey except where it is necessary to fulfil its legal and regulatory obligations.

8. **CONSENT**

- 8.1. The Church will only Process Personal Data on the basis that Data Subjects have given, and have not withdrawn, their consent to such Processing.
- 8.2. For the purposes of this Policy, consent means a clear communication of the Data Subject's wishes and by which they signify agreement to the Processing of their Personal Data by a statement or an action (such as ticking a box).
- 8.3. If the Church wishes to obtain the consent of a Data Subject for the purposes of this Policy, it will:
- 8.3.1. request such consent in an intelligible and easily accessible form, using clear and unambiguous language;
  - 8.3.2. make sure that the Data Subject understands that they are free to withdraw their consent at any time, and inform them how they may do so;
  - 8.3.3. keep a record of the consent having been given.

9. **ACCURACY**

Where the Church Processes Personal Data it will take reasonable steps to ensure that such Personal Data is accurate and, where relevant, up to date, and will correct inaccurate Personal Data without delay.

10. **RETENTION AND DESTRUCTION**

The Church will delete or anonymise Personal Data when it is no longer needed or required to be retained.

11. **DATA SECURITY**

- 11.1. The Church will take reasonable care, including implementing and maintaining appropriate technical and organisational security measures, in order to protect all Personal Data that it Processes.

- 11.2. The Church is obliged to report certain breaches of security affecting Personal Data to the competent data protection authorities and in some circumstances is also obliged to inform affected Data Subjects. A Church Officer who becomes aware of or suspects such a breach must inform the Data Protection Officer immediately so that the Church can comply with these obligations and address the possible breach.

**12. DATA SUBJECTS' RIGHTS**

- 12.1. Data Subjects have the right to:

- 12.1.1. be provided with a copy of any Personal Data that the Church holds about them;
- 12.1.2. require the Church to update or correct any inaccurate Personal Data, or complete any incomplete Personal Data, concerning them;
- 12.1.3. require the Church to stop processing their Personal Data for direct marketing purposes; and
- 12.1.4. object to the processing of their Personal Data more generally.

- 12.2. Data Subjects may also have the right, in certain circumstances, to:

- 12.2.1. require the Church to delete their Personal Data;
- 12.2.2. restrict the Church's Processing of their Personal Data, so that it can only continue subject to specific conditions.

- 12.3. If the Church receives a communication from any Data Subject in which they seek to exercise any of these rights, that communication should be passed to the Data Protection Officer as soon as is reasonably practicable so that the Church can respond appropriately. The Church Officers must comply with the instructions given by the Data Protection Officer in response to the exercise of these rights.

**13. CO-OPERATION WITH DATA PROTECTION AUTHORITIES**

The Church is obliged to co-operate with the competent data protection authorities in Jersey. Any communication received from a competent data protection authority should be passed to the Data Protection Officer as soon as is reasonably practicable.

**Policy Dated:**

**26<sup>th</sup> October 2025**

## **SCHEDULE TO THE POLICY**

The Church was notified by the Office of the Information Commissioner that it had been duly registered under the Data Protection (Jersey) Law 2018 on 19<sup>th</sup> November 2018. The following is a summary of the register entry:

**Notification Number:** 61687

**Security Code:** 3R133-45CD6

**Data Controller:** St Clement's Parish Church

**Address**

Church Office  
The Caldwell Hall  
La Grande Route de Saint Clément  
St Clement  
JE2 6QQ

The Data Controller holds data for the following four purposes:

### **PURPOSE 1: CHARITY AND VOLUNTARY WORK**

**Data subjects are:**

Complainants, Correspondents & Enquirers  
Members or Supporters  
Advisers, Consultants & Professional Experts  
Staff, Volunteers, Agents, Temporary & Casual Workers  
Relatives, Guardians & Associates of the Data Subject

**Data classes are:**

Family, Lifestyle & Social Circumstances  
Personal Details  
Financial Details  
Criminal Proceedings, Outcomes & Sentences  
Religious or other Beliefs of a Similar Nature  
Offences (including alleged offences)

**Recipients:**

Business Associates & other Professional Advisers  
The Individual or Customer Themselves  
Relatives, Guardians or other Persons associated with the Customer or Individual  
Suppliers, Providers of Goods & Services  
Voluntary, Charitable and Religious Organisations  
The Media  
Other Companies in the same group as your Company  
Another organisation acting on your behalf (data processors)

**Transfer of data:**

None outside the Bailiwick of Jersey and EEA

### **PURPOSE 2: GRANT AND LOAN ADMINISTRATION**

**Data subjects are:**

Advisers, Consultants & Professional Experts  
Members or Supporters  
Students & Pupils  
Relatives, Guardians & Associates of the Data Subject

Staff, Volunteers, Agents, Temporary & Casual Workers

**Data classes are:**

- Personal Details
- Financial Details
- Physical or Mental Health or Condition
- Family, Lifestyle & Social Circumstances
- Education & Training Details
- Goods or Services Provided

**Recipients:**

- The Individual or Customer Themselves
- Suppliers, Providers of Goods & Services
- The Media
- Employees and agents of your organisation
- Voluntary, Charitable and Religious Organisations
- Another organisation acting on your behalf (data processors)

**Transfer of data:**

Worldwide

**PURPOSE 3: MEMBERSHIP ADMINISTRATION**

**Data subjects are:**

- Complainants, Correspondents & Enquirers
- Members or Supporters

**Data classes are:**

- Family, Lifestyle & Social Circumstances
- Personal Details
- Offences (including alleged offences)
- Criminal Proceedings, Outcomes & Sentences

**Recipients:**

- The Individual or Customer Themselves
- Relatives, Guardians or other Persons associated with the Customer or Individual
- Suppliers, Providers of Goods & Services
- Other Companies in the same group as your Company

**Transfer of data:**

None outside the Bailiwick of Jersey and EEA

**PURPOSE 4: PERSONNEL, EMPLOYEE AND PAYROLL ADMINISTRATION**

**Data subjects are:**

- Relatives, Guardians & Associates of the Data Subject
- Staff, Volunteers, Agents, Temporary & Casual Workers

**Data classes are:**

- Education & Training Details
- Family, Lifestyle & Social Circumstances
- Financial Details
- Personal Details

**Recipients:**

- Current, past or prospective employers of the individual
- The Individual or Customer Themselves
- Education, Training Establishments & Examining Bodies
- Relatives, Guardians or other Persons associated with the Customer or Individual
- Trade, Employer Associations & Professional Bodies

**Transfer of data:**

None outside the Bailiwick of Jersey and EEA