Data Protection Policy

Excel Church collects and uses Personal Data about living individuals for the purposes of church administration, communication, and ministry delivery. This Data Protection Policy covers the use and protection of Personal Data by Excel Church. It also applies to the processing of personal data in both manual and electronic records and includes our responsibilities relating to data breaches and data subject rights.

This policy applies to all individuals whose Personal Data is processed by Excel Church, including job applicants, existing and former employees, volunteers, trustees, contractors, congregation members, and service users (referred to as Data Subjects).
Excel Church recognises the importance of the correct and lawful handling of Personal Data. All Personal Data whether held on paper, digitally, or by other means will be processed in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Excel Church fully endorses and adheres to the data protection principles set out in the UK GDPR. These principles set the legal framework for obtaining, handling, processing, storing, and sharing Personal Data. All staff, volunteers, and third parties who process Personal Data on behalf of Excel Church are required to comply with this policy. Where third parties process data on our behalf, Excel Church ensures appropriate safeguards and agreements are in place.

Data protection is the responsibility of everyone within Excel and this Data Protection Policy sets out what we expect from all persons handling Personal Data to enable us to comply with the applicable law.

Definitions

Personal Data – Information relating to an identifiable individual.
Special Category Data – Includes health, race, religion, sexual orientation, and similar sensitive data.
Criminal Offence Data – Data relating to criminal convictions and offences.
Processing – Any operation performed on Personal Data including collection, storage, use, sharing, or deletion.

Data Protection Officer

Excel Church has appointed a Data Protection Officer (DPO) to oversee the Data Protection Policy and related policies.

Contact Details: Data Protection Officer: Daniel Lee the Data Protection Officer info@excelchurch.org.uk. 01902402273

Please contact the DPO with any questions about the operation of this Data Protection Policy or if you are concerned that this Data Protection Policy is not being or has not been followed.

1. UK GDPR Principles

Everyone processing Personal Data on behalf of Excel Church must comply with the following data protection principles.

- **Lawfulness, fairness and transparency** Process data lawfully, fairly, and transparently in relation to the data subject.
- **Purpose limitation** Collect data only for specified, explicit and legitimate purposes. Do not use it for incompatible purposes without a new legal basis.
- **Data minimisation** Only collect data necessary for your specific role or task. Delete or anonymise data when no longer needed in line with our Retention Schedules as specified in point 12 of this document.
- **Accuracy** Ensure all data is accurate, complete, and up to date. Check accuracy at collection and regularly thereafter. Promptly correct or delete inaccurate data.
- **Storage limitation** Retain data only as long as necessary for its purpose or as required by law.
- **Integrity and confidentiality** Keep data secure and confidential using appropriate technical and organisational measures. Share only when necessary for church administration, legal requirements, or ministry purposes. All staff and volunteers must sign a confidentiality agreement.
- **Accountability** Respect data subjects' rights under UK GDPR and demonstrate compliance through proper documentation, training, and impact assessments.

Excel Church maintains records of processing activities and can account for what personal data it holds, where it comes from, how it is used, and who it is shared with.
We also carry out regular risk assessments to identify vulnerabilities in data processing and take steps to reduce risks.

Data Subject Rights

Data Subjects have the following rights:

- Right to be informed
- Right of access
- Right to rectification
- Right to erasure
- Right to restrict processing
- Right to data portability
- Right to object
- Rights relating to automated decision-making and profiling

Requests should be made to the DPO. Excel Church will respond within one month, with extensions where permitted. Requests are generally free unless excessive or repetitive.

Types of Data Held
Excel Church may process the following data:

- Names, addresses, and contact details
- Emergency contacts
- Donation and financial information
- Employment and volunteer records
- Safeguarding and health information
- Attendance and participation records
- Communications and correspondence
- Training, conduct, and performance records

You should review our Privacy Notice for additional information on how we process Personal Data. A copy of the Privacy Notice can be found via this link Privacy Notice

2. How We Collect Your Personal Data

Excel Church collects when you:

- Visit our website;
- Register your or your family's details on Church Suite;
- Make a donation (online, in person, or electronically);
- Register for a church event or conference;
- Provide contact information to staff or volunteers;
- Purchase church-related goods or services;
- Attend church services or activities;
- Communicate with us via email, letter, phone, or face-to-face;
- Engage on social media (Facebook, YouTube, WhatsApp, Instagram, etc.);
- Apply for employment or become an employee.

3. Lawful Basis and Use of Your Information

As a registered charity, the Church processes personal data in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and guidance issued by the Information Commissioner's Office.
The Church processes personal data in order to advance religion, fulfil its charitable purposes, serve its congregation and community, and ensure proper governance and administration.

Our Lawful Bases for Processing Personal Information

Our lawful bases for collecting or using personal information to provide and improve services in line with our charitable purposes are:

• Consent
We have permission from you after providing all relevant information. All your data protection rights may apply, except the right to object. You have the right to withdraw your consent at any time.
• Legal Obligation
We have to collect or use your information to comply with the law, such as in relation to Gift Aid, charity law requirements, safeguarding duties, or under employment, social security, social protection law, or a collective agreement.
• Contract
We have to collect or use your information so we can enter or carry out a contract with you. All your data protection rights may apply, except the right to object.

• Legitimate Interests
We are collecting or using your information because it benefits you, our organisation, or someone else, without causing undue risk of harm to anyone. All your data protection rights may apply, except the right to data portability.
Our legitimate interests are:

- To provide pastoral care, worship services, religious activities, and community support in line with our charitable purposes
- To maintain membership and congregation records
- To communicate about church services, events, and activities
- To manage volunteers, trustees, and staff
- To administer donations and stewardship
- To ensure safeguarding and security
- To fulfil governance and accountability responsibilities as a registered charity

• Vital Interests
Collecting or using information is necessary where someone's physical or mental health or wellbeing is at urgent or serious risk. This includes situations involving an urgent need for life-sustaining food, water, clothing, shelter, or medical assistance.
• Public Task
We may collect or use your information where necessary to carry out a task laid down in law which the law intends to be performed by an organisation such as ours.

4. Special Category and Sensitive Personal Data

We may collect special category and Sensitive Personal Data, which includes:

- Health details (e.g., for event support or pastoral care)
- Religious affiliation and attendance
- Safeguarding concerns or declarations
- Racial and Ethnic data

We may also process Criminal Offence Data where necessary, particularly for safeguarding and legal obligations. All such data is handled with strict confidentiality

All such data is kept confidential and used strictly in line with UK GDPR requirements. It is never sold or disclosed unlawfully.

Special category data is processed under Article 9(2)(d) UK GDPR for not-for-profit religious bodies.

5. Artificial Intelligence

To enhance our services, we may use Artificial Intelligence (AI) technologies, including Large Language Models (LLMs), to process a limited amount of your Personal Data. Where we process your Personal Data using AI, we take steps to ensure your Data is anonymized or pseudonymised.

We do not use AI for:

- Fully automated decision-making that significantly affects you
- Profiling that produces legal or similarly significant effects
- Any processing without appropriate human oversight

6. Consent

Consent is one of the lawful bases for processing Personal Data and may be required as a condition when processing special category data.

A Data Subject consents to the processing of their Personal Data if they clearly indicate agreement to the processing through a clear affirmative action. Valid Consent is any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

A record of the Data Subject's consent must be retained to demonstrate compliance with UK GDPR obligation and Consent must be renewed if processing Personal Data for a new purpose that is incompatible with the original purpose for which Consent was given.

A Data Subject must be able to withdraw their Consent to the processing of their Personal Data at any time. Withdrawal must be as easy as giving Consent, promptly honoured and completed without penalty or detriment to the Data Subject.

7. Database Use

Excel Church uses Church Suite, a UK-based and GDPR-compliant church management system, to store personal data. Church Suite is hosted on secure servers within the UK and provides robust data protection features.

Access controls include:

- Access is restricted via individual passwords and two-factor authentication where available

- Role-based permissions limit access to necessary data only
- Access is monitored and logged by the Database Administrator
- Authorised users include Trustees, staff, data inputters, department leads, and Connect Group leaders
- Personal data will never be shared without Consent or legal requirement

8. Recording/CCTV/Social Media

Excel Church is committed to creating a safe and welcoming environment for all who attend. Please note that worship services and certain church events may be recorded and live streamed via platforms such as YouTube, Facebook, and other social media channels. Photographs and video recordings may also be taken during services and events and may be used in church publications, promotional materials, the church website, and official social media platforms to support members who are unable to attend in person and to share our ministry more widely. By entering the church premises or attending church events, you acknowledge that you may appear in such recordings, photographs, or live-streamed footage. In addition, CCTV operates on site for the purposes of safety, security, and crime prevention. All recordings, photographs, live-stream content, and CCTV footage are managed securely, accessed only by authorised individuals, and retained in accordance with applicable data protection legislation. A copy of Excel Church Social Media and IT Policy can be found via this link Social Media and IT Policy

9. Data Security

Personal Data must be secured by appropriate technical and organisational measures against unauthorized or unlawful processing and against accidental lost, destruction or damage.

Excel Church implements physical, digital, and procedural safeguards appropriate to the size scope and business, our available resources and the amount of Personal Data that we process or maintain including the identified risks. These safeguards are in place to protect the Personal Data we process against unauthorized or unlawful processing and against accidental lost, destruction or damage

The measures include:

- Password-protected systems
- Encrypted storage for sensitive data
- Controlled access on a “need to know” basis
- Staff obligations not to send sensitive data to personal emails
- Screen locking and document security
- Secure document storage and shredding of confidential paper records
- Regular security reviews and updates
- Portable data devices (e.g., USBs, laptops) must be authorised and encrypted if used to store any personal data

10. Personal Responsibilities for Data Security:

All staff, volunteers, and authorised users who handle Personal Data must:

- Complete mandatory
- data protection training and stay updated on security practices
- Comply with all data protection procedures, technologies, and safeguards
- Report security concerns, vulnerabilities, or suspected breaches to the DPO immediately
- Only access data necessary for your specific role—never out of curiosity
- Use strong, unique passwords and enable two-factor authentication where available
- Keep passwords confidential and never share them
- Lock your screen when away from your workstation and log out when finished
- Respect confidentiality obligations at all times, including after your role ends
- 0Only use authorised, encrypted, and password-protected devices for Personal Data
- Store data only in designated church systems (e.g., Church Suite)—not on personal devices or unsanctioned locations
- Obtain DPO approval before using new devices or storage media
- Report lost or stolen devices containing Personal Data immediately
- Follow backup procedures and never bypass security measures
- Never send sensitive data to personal email accounts or unsecured platforms
- Use encrypted methods for transmitting Personal Data
- Only share data externally with third parties who have signed data processing agreements
- Verify appropriate safeguards are in place before any external sharing
- Verify accuracy at collection and check regularly thereafter
- Promptly correct or delete inaccurate or outdated data and document changes
- Delete or securely destroy data when no longer needed, following retention schedules
- Store paper records in locked cabinets or secure rooms
- Never leave confidential documents visible or unattended
- Shred paper records when no longer needed
- Do not remove records from church premises without authorisation
- Consider data protection implications at the start of any new project or system Minimise data collection to only what is necessary
- Consult the DPO when planning significant changes to data processing activities

Failure to follow these data security requirements may result in disciplinary action up to and including termination of employment or removal from volunteer roles, reputational damage to Excel Church and Bilston People's Centre and regulatory action by the Information Commissioner's Office.

If you are uncertain about any of these requirements or how they apply to your specific situation, contact the Data Protection Officer for guidance.

11. Use of Personal Devices

Excel Church recognises that staff, volunteers, and ministry leaders may occasionally use personal devices (including mobile phones, tablets, and laptops) to access, process, or store personal data in connection with church activities. While this can support flexible and effective ministry, it also presents data protection and security risks that must be properly managed.

The use of personal devices for church business is permitted only where appropriate safeguards are in place. Individuals using personal devices to process personal data must ensure that:

- Devices are protected with strong passwords, PINs, or biometric security.
- Automatic locking is enabled after a short period of inactivity.
- Operating systems and applications are kept up to date with the latest security updates.
- Appropriate antivirus and security software is installed where applicable.
- Personal data is accessed only through approved church accounts or secure systems.
- Personal data is not stored on the device longer than necessary and is deleted securely when no longer required.
- Devices are not shared with others in a way that could compromise confidentiality.
- Public or unsecured Wi-Fi networks are avoided when accessing sensitive personal data, unless a secure connection (e.g., VPN) is used.

Personal data must not be transferred to personal devices where this is unnecessary for church purposes. Sensitive personal data (including special category data) must be handled with particular care and should only be accessed on personal devices where strictly required and authorised.

In the event that a personal device used for church purposes is lost, stolen, compromised, or suspected of being subject to unauthorised access, this must be reported immediately to the Church Leadership or designated Data Protection Lead so that appropriate action can be taken.

Excel Church reserves the right to require the deletion of church-related personal data from personal devices where necessary to ensure compliance with data protection obligations.

All individuals handling personal data on behalf of Excel Church are responsible for ensuring that personal data is processed securely, lawfully, and in accordance with applicable data protection legislation at all times.

12. Data Retention

Our standard retention periods include:

- Safeguarding records: 10 years
- Financial records: 7 years
- Church Suite data: 25 years

Retention schedules are regularly reviewed and documented. When personal data is no longer required, it will be securely deleted or anonymised.

13. Maintaining Confidentiality and Integrity

Personal Data will only be disclosed externally in these situations:

- Where we are legally required to do so;
- Where we have a legitimate interest in doing so;
- Where there is a clear public interest or duty;
- To protect your vital interests (e.g., medical emergency);
- Where you have given explicit Consent.

14. Accountability

Excel Church has implemented appropriate technical and organisational measures in an effective manner to ensure compliance with the data protection principles. These include:

- Appointing a DPO
- Regularly training our personnel who process Personal Data
- Maintaining Records of Processing Activities
- Regularly testing our privacy systems to ensure they are suitable
- Completing Data Protection Impact Assessment when implementing major system or business changes that involve the Processing of Personal Data

15. Data Breaches

If you know or suspect that a Data Breach has occurred you must report this to the DPO without undue delay.

Excel Church will notify the Information Commissioner's Office (ICO) within 72 hours if a breach poses a risk to individuals' rights or freedoms.

Affected Data Subjects will be informed directly where the Data Breach is likely to result in a high risk to your rights and freedoms.

Where broader notification is warranted, Excel Church will notify the public without undue delay.

16. International Data Transfers.

Excel Church recognises that international data transfers may occur in the course of our activities, including mission work, international conferences, partner church relationships, and the use of cloud-based services with servers located outside the UK.

Personal Data must not be transferred to any country or territory outside the United Kingdom unless appropriate safeguards are in place to protect the rights and freedoms of Data Subjects. These include:

- The country has been approved by the UK Government as having adequate data protection standards
- We have appropriate legal safeguards in place (standard contracts, binding rules, or certifications approved by the UK Government or ICO)
- You have obtained consent from the individual after explaining the risks of transferring their data to that country
- The transfer is necessary to:
    - Fulfil a contract with the individual
    - Establish, exercise, or defend legal claims
    - Serve a substantial public interest
    - Protect someone's life (where consent cannot be obtained)
    - Provide publicly available information from an official register

You must always consult the Data Protection Officer before transferring Personal Data to a country outside of the United Kingdom.

Failure to comply with these requirements may result in disciplinary action and could expose Excel Church to significant regulatory penalties.

17. Data Subject Rights Under UK GDPR

Data Subjects have the following rights in relation to their Personal Data:

- Request access to your Personal Data;
- Request correction of inaccurate or incomplete data;
- Request deletion (in certain cases);
- Object to processing or request restriction of processing;
- Withdraw Consent at any time (where processing is based on Consent);
- Complain to the ICO if you believe your data rights have been violated.

To make a request, email info@excelchurch.org.uk or write to Data Protection Officer, Excel Church, Wolverhampton Street Bilston, West Midlands WV14 0LT.

We aim to respond within one calendar month. This may be extended by two months for complex or multiple requests.

Requests are normally free of charge unless they are manifestly unfounded, excessive or repetitive in which case we may charge a reasonable fee or refuse your request.

18. Record Keeping

We maintain records of our processing activities including data sources, purposes, sharing, and retention. These records are kept up to date.

- The name and contact details of the Data Controller and the DPO
- Clear description of personal data types
- Categories of data subjects
- Processing activities and purposes
- Third-party recipients of the personal data
- Storage locations
- International data transfers (if any)

19. Changes to this Data Protection Policy

We keep this Data Protection Policy under regular review to ensure it remains compliant with current legislation and best practice.

This version was last updated: May 2026

Policy Agreement

Name:

I function in the roles below (please tick all those that apply)

☐ Staff member	☐ Church Leader
☐ Connect Group Leader	☐ Data Input Volunteer
☐ Department Leader	☐ Trustee
☐ Volunteer	☐ Other (please specify): _____

I have read and understood this policy and agree to adhere to its contents.

Signed:

Date:

Excel Church Data Protection Policy – Glossary

Accountability – Demonstrating compliance with UK GDPR through proper records, training, and impact assessments.

Artificial Intelligence (AI) – Technology used to process limited Personal Data safely and anonymously, with human oversight.

CCTV – Video surveillance for safety and security.

Church Suite – Secure, GDPR-compliant system for storing Personal Data.

Consent – Permission from a person to process their Personal Data, freely given, specific, informed, and withdrawable at any time.

Confidentiality – Keeping Personal Data private and only sharing it when authorized or legally required.

Data Breach – Unauthorized access, loss, or disclosure of Personal Data.

Data Controller – The entity (Excel Church) that decides how and why Personal Data is used.

Data Input Volunteer – Volunteers who enter Personal Data into church systems.

Data Protection Officer (DPO) – Person responsible for overseeing data protection compliance (Daniel Lee).

Data Subject – A living individual whose Personal Data is processed.

Encryption – Securing Personal Data so it cannot be read without permission.

Employee – Staff member handling Personal Data as part of their role.

Integrity – Ensuring Personal Data is accurate and protected from unauthorized changes.

International Data Transfers – Sending Personal Data outside the UK with proper safeguards.

Lawful Basis for Processing – Legal justification for using Personal Data, such as Consent, Legal Obligation, Contract, Legitimate Interests, Vital Interests, or Public Task.

Large Language Model (LLM) – A type of AI used safely under Excel Church policies.

Minimisation (Data Minimisation) – Collecting only the Personal Data needed for a specific purpose.

Personal Data – Information about a living person, e.g., name, contact, donations, health, or religious beliefs.

Privacy Notice – Document explaining how Personal Data is collected and used.

Processing – Any action with Personal Data, including collection, use, storage, or deletion.

Public Task – Processing Personal Data as required by law for tasks intended for organizations like Excel Church.

Retention Schedule – How long different types of Personal Data are kept (e.g., safeguarding records: 10 years).

Rights of Data Subjects – Legal rights to access, correct, delete, or object to Personal Data processing.

Special Category Data – Sensitive Personal Data like health, religion, ethnicity, or safeguarding information.

Storage Limitation – Keeping Personal Data only as long as necessary.

Social media – Platforms used by Excel Church for communication, managed under GDPR rules.

Technical and Organisational Measures – Steps to protect Personal Data, such as passwords, encryption, and staff training.

Trustee – Church leadership member responsible for compliance and oversight.

UK GDPR (UK General Data Protection Regulation) – UK law protecting Personal Data.

Vital Interests – Processing Personal Data to protect someone's life or prevent serious harm.

Volunteer – Individuals supporting Excel Church who handle Personal Data and follow data protection rules.