

## Cumbria District Data Protection Policy & Privacy Notice

1. Under the provisions of the General Data Protection Regulation ('GDPR') and Data Protection Act 2018, the Cumbria Methodist District ('the District'), acting through its relevant office holders, holds a limited amount of data, usually comprising the names and contact details (addresses, telephone numbers, and/or email addresses) of its ministers, officeholders, and employees, and of some of its members, friends, and ecumenical or community colleagues.
2. The District holds the data for the following legal reasons:-
  - a) Much of the data is held for the **legitimate interests** of the District (such as to maintain a list of ministers, officeholders and relevant contacts, so as to communicate appropriately with them).
  - b) Some data is held for **contractual obligations** and purposes (for example in connection with District employees).
  - c) Some data is held to fulfil the District's **legal obligations** (such as to comply with HMRC requirements).
  - d) Additionally, some data is held and shared with the relevant individual's **consent** (in particular, whilst the District has a legitimate interest in holding the data included in the District Directory, it can generally only share that data with the consent of the relevant individuals. Accordingly, where individuals have not given that consent, only their names will be included).
3.
  - a) District officeholders shall keep such data securely; shall not communicate it to a third party (unless for the legitimate interests, legal or contractual obligations referred to above, or through an individual's consent); shall keep such data only as long as there are legal reasons for doing so; and shall then destroy it securely.
  - b) Individuals have the right to access the data held about them, and to have it amended or deleted. Queries concerning this should be raised initially with the District Administrator.
  - c) The data set out in the District Directory is held electronically by the District Administrator (and can also be accessed by the District Chair). Copies of the Directory are shared (generally in September) with the individuals listed within the contact details sections of the Directory, and with appropriate ecumenical (specifically Churches Together in Cumbria or the God for All Team) or Learning Network colleagues; if any listed individual has any concerns about this, please contact the District Administrator.
  - d) The sharing of the Directory with the individuals named within it or with ecumenical or Learning Network colleagues is only on the following conditions: that recipients shall keep the Directory safely; shall not communicate the data contained in it to a third party (unless as a District officeholder on the grounds of the legal reasons provided for above); shall keep the Directory only as long as there are legitimate reasons for doing so; and shall then destroy it securely.
  - e) Any known breach in the security of the data shall be reported as may be required or appropriate under the wider data protection policy of the Methodist Church, or any wider legal obligations applying from time to time.
4. The District is part of the Methodist Church, whose wider data protection arrangements, policies and privacy notice also apply, for which please see: <https://www.tmcp.org.uk/about/data-protection>.

Approved by the District Policy Group, October 2020