

Data protection policy (DPA 2018)

M.J.CHURCH >

This document is mandatory and must be adhered to.

Data protection policy v1

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1. Purpose

Ensure that only safe and necessary network services can be accessed from the Internet.

2. Scope

All processing of personal data within MJ Church

3. Policy requirements

3.1. General requirements

- a. This policy applies to all personal data processed by MJ Church.
- b. The Responsible Person shall take responsibility for MJ Church's ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.
- d. MJ Church shall register with the Information Commissioner's Office as an organisation that processes personal data.

3.2. Data protection principles

MJ Church is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures."

3.3. Lawful, fair and transparent processing

- a. To ensure its processing of data is lawful, fair and transparent, MJ Church shall maintain a Register of Systems.
- b. The Register of Systems shall be reviewed at least annually.
- c. Individuals have the right to access their personal data and any such requests made to MJ Church shall be dealt with in a timely manner.

3.4. Lawful purpose

- a. All data processed by MJ Church must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests ([see ICO guidance for more information](#)).
- b. MJ Church shall note the appropriate lawful basis in the Register of Systems.
- c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- d. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in MJ Church's systems.

3.5. Data minimisation

- a. MJ Church shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- b. MJ Church carries out an annual review of its systems, information and assets to ensure that it minimises and reduces where possible.

3.6. Accuracy

- a. MJ Church shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.
- c. MJ Church has ensures that through it's privacy policy and various fair processing notices throughout it's data capturing channels that data subjects have a clear route to exercising their rights, including updating of information

3.7. Security

Please refer to the information security policy for more information

<https://sharepont.link/sharepoint>

3.8. Breaches

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, MJ Church shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO (more information on the ICO website).

MJ Church operates a robust incident management process to identify, contain and manage the risk and protection individuals' rights and freedoms. If it is deemed that the rights and freedoms of an individual is at risk, MJ Church will contact the relevant individuals in parallel with the ICO.

3.9. Archiving / removal

4. Glossary of terms

DPA 2018	The Data Protection Act 2018
Responsible person	Means the data protection officer **
Register or systems	The MJ Church data asset and system register

5. Related documents

Name	Location	Date
Information security policy	SharePoint	18/10/2018

6. Review

This standard is subject to annual review and was last reviewed 18/10/2018

7. Non compliance

Non-compliance to this policy can lead to disciplinary action and personal accountability under the relevant law