

## Privacy Policy

The Community of St Anselm is a data controller registered with the Information Commissioner's Office in the UK. In this updated Privacy Policy, we aim to clarify:

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## 1. What data we process and why

We store and process personal data to:

- Stay in touch with people who sign up to our mailing list
- Process applications to Community Membership
- Keep appropriate records of Community members and alumni
- Keep records of financial activities and donations, Gift Aid certificates etc. in accordance with HMRC obligations.

We collect, process and store data to enable us to process applications to Community Membership. If you begin an application with us, we will ask you for:

- Some key personal information – your name, address, date of birth, nationality and family situation. This is to make sure you are eligible for membership in the Community.
- Some detailed questions about your church involvement, medical needs and any criminal history ('safeguarding'). This is sensitive information that we use to discern if Community life is suitable for you this year.
- Some uploaded documents (such as passports) to satisfy our statutory requirements for ID checks and visa sponsorship
- Some short-written reflections on why you would like to join the Community of St Anselm in particular, including a personal statement.
- References from your chosen referees, which are kept securely on our online platform



Some data (your age, nationality, church denomination) will later be anonymised and used for statistical processing. Certain data, including statistical data, is processed securely by us on the Church of England's servers, which is covered by their comprehensive data protection policies. None of the personal information you give us will ever be sold or shared for other purposes or used for automated decision making like credit checks.

## **2. Where we get your information**

The information we store, and process is obtained from:

- Our website, if you have signed up to receive mailings via our website
- Your application form and any previous applications you may have submitted in the last two years
- References from your chosen referees, which are stored and processed alongside your application on our application platform.
- Any uploaded documents you send us (such as passports and other ID documents)

## **3. Who we share your data with**

We use an online applications platform called HEIapply, provided by a company called Action Starter, which is based in Birmingham, UK. All of your information is processed on UK-based servers. ([actionstarter.co.uk](http://actionstarter.co.uk))

After you submit your first stage application, your application will be confidentially reviewed by three separate reviewers using the same online system, some of whom are based in the some of whom are based in countries other than the UK. Our reviewers agree to strict data protection guidelines and only see enough information to make an informed recommendation.

If you require a visa, we share your complete application file and passport details with the Authorising Officer in charge of visa sponsorship for the Church of England Central Services, who will be sponsoring your visa.

Financial data is shared with our accountant, Charity Accounting Services Ltd, for the purpose of processing donations, payments, Gift Aid claims and HMRC returns.

Finally, personal details about Community Members – name, nationality, church background, and occasionally pastoral details – are shared in confidence with the Archbishop of Canterbury (in his Corporate Capacity) and in his capacity as Abbot of the Community, with his Chaplain or the Bishop at Lambeth, and if necessary to the Provincial Safeguarding Officer.

## **4. How long we hold your information**

How long we keep your data will depend on how far you've progressed in your application with us. If you have created a profile with us, we will keep your email address on file for 5 years, so that if you would like to reapply next year, you can log in with the same profile, although you will have to fill in a new application form. Submitted applications are retained for 3 years, for ID checks against any previous applications. If you request deletion of your data, unless



there are legal or safeguarding reasons why data must be kept, this will happen within 72 hours of our receiving the request.

A copy of our data retention schedule is available on request.

## 5. Your rights

A new set of regulations that come into effect in the UK and the EU on 25th May 2018 emphasise your rights over your own data. These are:

- The right to have your personal data corrected, restricted, or deleted from our system
- The right to ask for any data you have given us in an easily transferable format. This is called a 'subject access request' and we must respond by law within 72 hours (your data would be provided in a standard .csv format file)
- The right to withdraw your permission for us to use or store your data
- The right to object to any further processing of your data

There are some exemptions under the law, for example if there are legal or safeguarding reasons why the data must be kept.

## 6. What happens if you don't provide your information

We need to use certain kinds of information (termed 'special categories of personal data') to make informed decisions about who to invite into Community membership. We let you know this up front, so you know what will happen to the data you provide, should you continue with your application.

## 7. Breaches, concerns and complaints

In the unlikely event of a personal data breach that might pose a risk to your rights or freedoms, we will notify the Information Commissioner's Office in the UK (the ICO) within 72 hours of becoming aware of the breach and will contact you as quickly as possible.

If you have any complaints or questions about the way we handle your personal data, you may wish to contact our office at [stanselm@lambethpalace.org.uk](mailto:stanselm@lambethpalace.org.uk), or call 0207 898 1210, to chat through your concerns.

In the case of a serious problem, you have the right to complain to our supervisory authority:

### **Information Commissioner's Office (ICO)**

Phone: 0303 123 1113

Email: <https://ico.org.uk/global/contact-us/email/>

Address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.



## **8. Lastly: few definitions, and our legal basis for processing your data**

We are a data controller. That means we collect and decide what to do with your personal data.

Personal data is any information that identifies you as a person in some way, such as your name, address, email, IP address etc. We use personal data in our day-to-day activities such as sending out emails to our mailing list and processing financial transactions and donations.

If you apply to become a member, you provide us with personal data, including 'special categories' of personal data such as your religion, medical circumstances and criminal record, in the course of your application. We process this data by your explicit consent. Occasionally, processing of sensitive information is carried out, with appropriate safeguards, in the course of legitimate pastoral or legal activities by the Community. In such cases, processing relates solely to members or former members of the Community or to people in regular contact with us in connection to our core activities.