



The Friends of Ely Cathedral - Privacy Policy

As a membership organisation, The Friends of Ely Cathedral respects your privacy and is committed to protecting any personal information that is shared with us. We operate at all times within the context of current UK legislation. This policy is intended to comply with the General Data Protection Regulation (GDPR) 2016 and the Data Protection Act 2018. The policy describes:

- the type of information we collect from you or that you share with us;
- how we use it;
- how we protect it;
- how we share it with others;
- how you can manage the information we hold; and
- how you can contact us.

1. Who are The Friends of Ely Cathedral?

The Friends of Ely Cathedral (FoEC or the Friends) is a membership organisation with charitable status working in partnership with the Dean and Chapter of Ely Cathedral. The charity has nearly 2,000 members, most of whom pay an annual subscription. The Friends work closely with the Cathedral, raising funds from membership subscriptions, events, donations and legacies to help maintain and support aspects of the building and the community. The Friends also provide a social community for the members, holding a variety of events throughout the year and issuing regular communications.

Whilst The Friends of Ely Cathedral is closely associated with the Cathedral, the organisation is a registered charity, led by the Friends' Council. This privacy policy applies solely to The Friends but The Friends shares a database with the Cathedral so the policy complements the framework set by the Cathedral.

For the purposes of the GDPR, the Friends' Council is a 'data controller. This means that we are responsible for deciding how our organisation uses the personal data you provide but our data is held on the Cathedral's database.

We are committed to being transparent, fair and acting lawfully in how we collect and use your personal data.

As a membership organisation The Friends of Ely Cathedral does not employ a Data Protection Officer but if you would like to know what information we hold about you or if you have any other queries related to the Privacy Policy, our contact details are set out below:

The Friends' Officer, The Chapter House, The College, Ely, Cambridgeshire. CB7 4DL

email: friends@elycathedral.org

Telephone: 01353 660348

2. What information do we collect from you?

We only collect information from our members that is necessary, relevant and adequate for the purpose for which you provide it as described below:

- *Identity data:* first name, last name, title.
- *Contact details:* home address, email address(es) and telephone numbers.
- *Financial details:* when donations or payments are made, e.g. for subscriptions, events, donations or legacies, financial identifiers such as bank account details.
- *Transaction data:* includes details about payments to and from you and details of products or services you have purchased from us, e.g. tickets for events, notecards.
- *Communications data:* includes your preferences in receiving communications from us.

Membership of The Friends is not currently open to children under the age of 18 and we do not knowingly collect data relating to children in any form.

3. How does the FoEC collect personal data?

Personal data or personal information means any information about an individual from which that person can be identified. We collect personal data from the application form you complete when you apply to become a member of The Friends of Ely Cathedral. When you apply, you are asked to supply the basic identity details listed above, which are held on the database we share with the Cathedral.

If you choose to pay your membership subscription by standing order or direct debit, this information is retained in locked storage cabinets in a secure office and is not stored on the Cathedral database. If you write to us, the correspondence is also retained in a lockable storage cabinet. If you communicate with us via email, the data will be retained on the Cathedral's email system.

4. Why does FoEC process personal data?

Our data is processed because it is necessary for our legitimate interest, which is administering the activities of The Friends or for the performance of a contract, for example when you purchase tickets for an activity or event we have organised. We may also process personal data in order to comply with a legal obligation, for example in response to a request for information from the HMRC or to process an application for Gift Aid.

We always take into account the interests, rights and freedoms of those whose personal data we collect. The membership subscription entitles you to receive two mailings from us per year, one of which includes the Friends' Yearbook either in hard copy or by email. You may also receive information regarding any of the Friends' events. Some of our volunteers help in collating and/or delivering the printed materials so may have access to the home addresses of members.

The Friends do not send out marketing material to its members other than in relation to our own events. We will never send you 'junk' e-mails or share your personal information with any other organisation, except where legally required to do so.

In the unlikely event that we wish to use personal data for a new purpose which is not covered by this Privacy Policy, we will provide you with a new document, explaining the reason for the proposed new use and any changes to the processing conditions before we commence processing the data. You will have the opportunity to withdraw your agreement to our use of your data for a new purpose.

5. Who has access to your personal data collected by the Friends?

Any personal data you provide will be treated as strictly confidential. Your membership application form and the data it contains will only be available to the Friends' Officer, the Subscription Secretary

and the Treasurer for legitimate processing purposes. The website on which the data is held is managed by the Cathedral's IT team, who provide the Friends' Office with technical support.

6. How do we share your information?

Other than as expressly set out in this Privacy Policy or as otherwise required or permitted by law, for example, in relation to a Gift Aid declaration you have made, we will not share, sell or distribute any of the information you provide to us without your consent.

7. How does the FoEC protect data?

The FoEC takes the security of personal data seriously. The Cathedral IT team have internal policies and controls in place to ensure that the personal data it holds or processes on behalf of The Friends is not lost, accidentally destroyed, misused or disclosed and is not accessed except by its employees in the proper performance of their duties.

Where the FoEC engages third parties including the Cathedral IT team to process personal data on our behalf, we will only do so on the basis of written instructions, under a duty of confidentiality, where it is necessary to implement appropriate technical or organisational measures to ensure the security of your data.

Data transmission over the internet is inherently insecure so we cannot guarantee the security of any data you send us via email.

If we suffer a security breach that compromises any personal data, we will notify the Office of the Information Commissioner (ICO) within 72 hours as required by law.

8. Retention of personal data

In general, we aim to keep data only for as long as we need it to administer your membership. If you choose not to renew your annual membership of the FoEC, we will cease processing your data from the end of the final full year of membership.

We will keep some records permanently if we are legally required to do so or for the purpose of maintaining an archive record of who has been a member of The Friends. We may keep some records for an extended period of time, for example financial records will be retained for a minimum period of seven years in order to be able to respond to HMRC audits.

9. Your rights

You have the right to:

Request access to your personal data, which is known as making a 'data subject access request. This enables you to receive a copy of the personal data we hold about you and to check that we are processing it lawfully. If you wish to do this, please contact us by writing to the Friends' Officer at the address shown in section 1 above. We will not charge a fee for the first two such requests you make but may thereafter charge a fee to meet our costs in providing you with details of the information we hold about you.

Request correction of the personal data we hold about you. You are entitled to ask us to make any necessary changes to ensure that your records are accurate and kept up to date. It is important to us that the personal data we hold about you is accurate and kept up to date so please keep us informed if the personal information we hold needs to be corrected or updated at any time.

Request erasure of your personal data. You can ask us to delete or remove personal data where there is no good reason for us continuing to process it in relation to your membership. When we receive your request, we will confirm whether the data has been deleted or, if not, the reason why it cannot be deleted, e.g. because we need it for our legitimate interests or for statutory purposes.

Object to processing of your personal data where FoEC is relying on our legitimate interests as the legal grounds for processing and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. When we receive your request, we will contact you to explain whether or not we are able to comply or whether we believe we have legitimate grounds to continue to hold your data in order to comply with your other rights or to bring or defend legal claims.

Request restriction of processing of your personal data. You may also ask FoEC to suspend the processing your data if you believe the data is inaccurate or there is a dispute about whether or not your interests override FoEC's legitimate grounds for processing data.

Request the transfer of your personal data to you or to a third party. We will provide you, or your chosen third party, your personal data in a structured, commonly used, machine readable format. This right only applies to automated information you consented to us using or where we used the information to perform a contract with you.

Withdraw consent to receiving information about Friends' activities. You may ask us to stop sending you any newsletters or information about FoEC activities or events at any time by notifying us in writing. Also, each Newsletter sent to you will remind you that you can unsubscribe from our mailing list. You should note that if you withdraw your consent, we may not be able to provide you with the membership services to which you have previously subscribed. We will advise you if this is the case at the time you withdraw your consent. If you receive any unwanted, unsolicited e-mails sent by us or purporting to be sent by us, please contact us immediately at friends@elycathedral.org

When exercising any of the rights listed above, we may need to verify your identity for your own security before we can process your request. You may not be able to exercise your rights until you have provided proof of your identity.

If you would like to exercise any of the above rights or have any concerns about the way in which we have or may use your data, please contact the Friends' Officer at the address shown in section 1 above and we will do our best to help. If you have any concerns about our use of your data or believe that FoEC has not complied with your data protection rights, you are entitled to refer the matter to the Information Commissioner's Office at any time either via the website www.ico.org.uk or by writing to:

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

10. Review of the Privacy Policy

We will keep our Privacy Policy under regular review and will ensure that the latest version is always available on the Cathedral website under the Friends' page at www.elycathedral.org/friends. Any significant changes to the Policy will be advised to members in the next available Newsletter.

Policy established: May 2021

Approved by Council: July 2021

Review date: May 2023 (subject to any earlier changes required by law)

Appendix One: Glossary

- a. **'Legitimate interest'** means the interest of our organisation in conducting and managing The Friends of Ely Cathedral to give you the best service and the best, safest and most secure membership experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you unless we have your consent or are otherwise required or permitted to do by law.
- b. **'Performance of contract'** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract. As an example, as a membership organisation, we need to process your subscription in order to ensure that you receive the benefits of your membership. Similarly, if you book tickets for a Friends' event or purchase items from us, e.g. notecards, we need to process your payment data in order to provide you with the service you have requested.
- c. **'Comply with a legal or regulatory obligation'** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation to which we are subject, e.g. processing Gift Aid claims to the HMRC.
- d. **'Third parties'** means any of the following:
 - The Dean and Chapter of the Cathedral ('the Cathedral'), all based in the UK and providing a service to us e.g. provision of IT support.
 - HM Revenue and Customs, the Charity Commission, regulators and other authorities based in the UK, who require reporting of processing activities in certain circumstances.