DATA PRIVACY NOTICE

HOPE CHURCH SITTINGBOURNE

LAST UPDATED 22/05/2026 (GW)

1. YOUR PERSONAL DATA – WHAT IS IT?
Personal data refers to any information relating to an identifiable living individual who can be directly or indirectly identified from that data, either alone or in combination with other information in the data controller's possession. The collection, storage, and processing of personal data within the United Kingdom are strictly governed by the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

2. WHO ARE WE?
The Board of Trustees of Hope Church Sittingbourne (HCS) is the designated Data Controller. This means the Trustees collectively determine the specific operational purposes for which your personal data is gathered and control how it is processed, protected, and ultimately disposed of.

3. THE TYPES OF DATA WE COLLECT
In the course of conducting our ministry, employment, and community activities, we collect and process the following categories of data:

- **Personal Identifiers:** Names, titles, photographic or video imagery (where explicit consent is secured), and dates of birth.
- **Contact Information:** Postal addresses, personal email addresses, telephone numbers, and unique digital user identifiers (such as Discord tags utilised within our Hope Hub platform).
- **Financial Data:** Bank account details for payroll processing, expense reimbursements, tithes, and tax status declarations necessary for processing Gift Aid claims with HMRC.
- **Special Category Data:** Information revealing religious beliefs (inherent in church membership), confidential pastoral care logs, private prayer requests, occupational health or medical information (used to support staff adjustments or manage absence), and sensitive safeguarding disclosures or Enhanced DBS status information.

4. HOW WE PROCESS YOUR PERSONAL DATA
HCS complies strictly with its legal obligations under the UK GDPR by ensuring that personal data is kept accurate and fully up to date; stored and destroyed securely; collected only for specified, explicit, and legitimate purposes; and heavily protected against loss, misuse, unauthorised access, or unlawful disclosure through robust technical and organisational security protocols.

We utilise your personal data for the following operational purposes:

- To administer formal church membership rolls, maintain accurate congregational records, and deliver consistent, confidential pastoral care.
- To manage, train, and support our employees, ministry leaders, interns, and volunteers, including the execution of necessary formal HR frameworks like our Disciplinary and Grievance procedures.
- To safely promote, coordinate, and run church events, groups, and community initiatives, alongside the safe operation of our digital platforms, including the Hope Hub on Discord.
- To fulfil our legal, statutory, and financial obligations as a UK registered charity, which includes processing Gift Aid claims, managing safer recruitment checks, and upholding strict safeguarding protections for children and vulnerable adults.
- To contact data subjects directly with organisational news, spiritual resources, events, or administrative updates that they have requested or consented to receive.

5. OUR LEGAL BASES FOR PROCESSING DATA
To comply with UK law, we must map every data processing task to a clear lawful basis. We process your data under the following statutory conditions:

- **Consent:** Where you have given clear, trackable, and unambiguous permission for us to process your personal data for specific activities, such as subscribing to church media updates or capturing public event photography.

- **Contractual Necessity:** Where processing is entirely mandatory to fulfil the obligations of an active employment contract or volunteer agreement, including payroll administration and staff management.
- **Legal Obligation:** Where processing is required by UK law, specifically relating to HMRC tax compliance, the retention of financial audits, or statutory safeguarding reporting to local authorities.
- **Legitimate Interests:** Where processing is necessary for the day-to-day running and growth of HCS as a faith-based charity, provided it does not override your fundamental privacy rights or individual freedoms.

Processing Special Category Data

Because we handle sensitive spiritual, pastoral, and safeguarding data, we apply an additional legal safeguard under Article 9(2)(d) of the UK GDPR. This permits a non-profit body with a religious aim to process sensitive data in the course of its legitimate activities, provided the processing relates solely to members, former members, or individuals who have regular contact with the church, and ensures that no sensitive data is disclosed externally without explicit consent.

6. DIGITAL INTEGRITY AND EMERGING TECHNOLOGY

- **Platform Security:** Data collected within our digital platforms (such as email systems, church management software, or the Hope Hub on Discord) is partitioned and accessed strictly by designated, authorised staff and leaders. Your digital user identifiers are never sold or leveraged for third-party tracking.
- **Generative AI Restrictions:** In alignment with our commitment to spiritual and structural integrity, HCS enforces a strict policy regarding the use of generative artificial intelligence tools. No sensitive personal data, identifying member descriptions, confidential pastoral care notes, or private prayer requests may be inputted into external generative AI models. AI systems are restricted exclusively to anonymous administrative research or creative brainstorming assistance.

7. SHARING YOUR PERSONAL DATA

Your personal data will be treated with absolute confidentiality. It will only be accessed by personnel who require it to fulfil their specific ministry or employment duties. We will never share your data with external third parties without your explicit consent, except in the following limited and legally mandated circumstances:

- To statutory bodies like HMRC for the processing of Gift Aid and payroll taxes.
- To local government or emergency services where there is an overriding, immediate statutory safeguarding obligation to protect a child or vulnerable adult from imminent harm.
- To cloud-based data processors or specialised software providers acting under our direct instructions (such as secure church database systems or payroll management platforms) that comply fully with UK GDPR security frameworks.

8. DATA RETENTION PERIODS

We do not retain personal data indefinitely or excessively. All records are kept in strict compliance with our internal Document Retention Schedule.

Specifically, financial and Gift Aid records are retained for a mandatory 6 years following the end of the financial year to satisfy UK tax laws. Membership and general communication lists are regularly audited and purged every two years, or immediately upon a data subject requesting removal. Staff HR data, including disciplinary case notes, aligns strictly with active enforcement periods: verbal warnings are purged after 6 months, first and final written warnings after 12 months, and core employment contracts are archived securely for 6 years post-termination to satisfy UK employment tribunal limitation windows.

9. YOUR STATUTORY RIGHTS UNDER THE UK GDPR

Unless subject to a specific legal exemption, you possess the following comprehensive rights regarding the processing of your personal data:

- **The Right of Access:** You can request a complete copy of the personal data that HCS currently holds about you (a Subject Access Request).

- **The Right to Rectification:** You can demand that we immediately correct any inaccurate, incomplete, or outdated personal data.
- **The Right to Erasure:** You can request that we completely erase your personal data from our systems where it is no longer legally or contractually necessary for us to retain it.
- **The Right to Restrict Processing:** You have the right to request a temporary freeze on how we process your data if you dispute its accuracy or contest our lawful basis.
- **The Right to Data Portability:** You can request that we transfer your digital personal data directly to another data controller in a structured, machine-readable format.
- **The Right to Object:** You can object at any time to the processing of your personal data where we rely on "Legitimate Interests" as our primary lawful basis.
- **The Right to Withdraw Consent:** Where our data processing relies entirely on your consent, you possess the right to completely withdraw that consent at any time.

10. REVISIONS AND FURTHER PROCESSING

The Trustees reserve the right to update this Data Privacy Notice from time to time to maintain compliance with evolving UK employment laws, charity guidance, or ICO regulations. If we wish to utilise your personal data for a completely new operational purpose not covered in this existing notice, we will publish a revised notice and secure your explicit consent prior to initiating that new processing activity.

11. CONTACT AND COMPLAINTS

To exercise any of your statutory data rights, or to submit a formal query or complaint regarding how your information is handled, please contact our administrative team directly at info@hopesittingbourne.org.

If you remain unsatisfied with how HCS has responded to your data request, you retain an absolute statutory right to lodge a formal complaint with the UK's data protection regulator, the Information Commissioner's Office (ICO), via their helpline on 0303 123 1113 or through their official portal at https://ico.org.uk/.