

1. Dealing with data protection breaches

- 1.1 Where staff or volunteers, think that the data privacy notice has not been followed, or data might have been breached or lost, this will be reported **immediately** to the Stewards team.
- 1.2 We will keep records of personal data breaches, even if we do not report them to the ICO.
- 1.3 We will report all data breaches which are likely to result in a risk to any person, to the ICO. Reports will be made to the ICO within **72 hours** from when someone in the church becomes aware of the breach.
- 1.4 In situations where a personal data breach causes a high risk to any person, we will (as well as reporting the breach to the ICO), inform data subjects whose information is affected, without undue delay.

This can include situations where, for example, bank account details are lost or an email containing sensitive information is sent to the wrong recipient. Informing data subjects can enable them to take steps to protect themselves and/or to exercise their rights.

2. Direct marketing

- 2.1 We will comply with the rules set out in the GDPR, the Privacy and Electronic Communications Regulations (PECR) and any laws which may amend or replace the regulations around **direct marketing**. This includes, but is not limited to, when we make contact with data subjects by post, email, or telephone (both live and recorded calls).

Direct marketing means the communication (by any means) of any advertising or marketing material which is directed, or addressed, to individuals. "Marketing" does not need to be selling anything, or be advertising a commercial product. It includes contact made by organisations to individuals for the purposes of promoting the organisation's aims.

- 2.2 Any direct marketing material that we send will identify 'Walton LEP', 'Walton Churches Partnership' or one of the churches in our Partnership as the sender and will describe how people can object to receiving similar communications in the future. If a data subject exercises their right to object to direct marketing we will stop the direct marketing as soon as possible.

3. Data subjects' rights

- 3.1 If anyone receives any request from a data subject that relates or could relate to their data protection rights, this will be forwarded to the Ecumenical Council **immediately**.
- 3.2 We will act on all valid requests as soon as possible, and at the latest within **one calendar month**, unless we have reason to, and can lawfully extend the timescale. This can be extended by up to two months in some circumstances.