

Processing personal data  
when the lawful basis is

# Legitimate Interest



**CROMERCHURCH**  
transforming lives with Jesus Christ

Our audit of personal data shows that almost all the personal data stored and processed by individual members of the Cromer Church family relates to **membership lists** and **rotas**.

The 'lawful basis' for storing and processing this data is **legitimate interest**. GDPR Article 6 1(f) defines this as processing "necessary for the purposes of the legitimate interests pursued by the controller". Further, GDPR Article 9 2(d) allows the processing of 'special category data' relating (in Cromer Church's case) to religious beliefs where "processing is carried out in the course of its legitimate activities with appropriate safeguards by a foundation, association or any other not-for-profit body with a political, philosophical, religious or trade union aim and on condition that the processing relates solely to the members or to former members of the body or to persons who have regular contact with it in connection with its purposes and that the personal data are not disclosed outside that body without the consent of the data subjects".

**The basic requirements of data protection law still apply**, so we need to ensure that:

- the personal data we hold is accurate;
- we keep it up to date;
- it is stored securely;
- we don't collect or retain information that we don't need;
- we don't use the data for any purpose than that for which it was collected;
- we erase or physically destroy it securely when it is no longer needed;
- we use appropriate technical and other measures to protect it from loss, misuse, unauthorised access or disclosure.

**You should take appropriate steps to keep the personal data you hold secure.** If you keep your records in a notebook or on paper, please ensure that they are not open to casual scrutiny. This means keeping them out of sight and, if possible, locked away. If you keep your records on your phone, computer or tablet this means protecting them (or the device) with a password or PIN. Information you no longer need should be shredded or securely deleted.

**Sharing the data with those in the group or on the rota for the purpose of running the group or administering rota is OK**, but you should put lists in a named envelope rather than loose in the pigeonholes. If emailing, you should put the addresses in the Bcc field so that they are not visible to other recipients and if your email provider offers the ability to send encrypted emails, you should turn this feature on. Data transferred by memory stick should be encrypted and password protected. Sharing the data with anyone outside Cromer Church is not OK unless you have specific consent to do so.

**You must not use the information for other purposes.** For example, it's OK to use the information in your membership list to invite members to the group's end-of-year BBQ but not to invite them to the Alpha launch supper, unless they give their consent.

**You should consider managing your group or organising your rota using ChurchSuite, our Church Management System.** This helps address many of the points mentioned above. Please speak to David Orsborne if you'd like further information or want to explore this option.