



## Purpose of this Policy

This privacy policy outlines the ways in which Montrose Trinity Church of Scotland (here after referred to as 'The Church') may use personal information provided to us by members and visitors.

The Church recognises the importance of your privacy and personal information and we have therefore outlined below how we use, disclose and protect this information.

This privacy policy additionally describes how personal information may be collected, used, and shared when individuals visit our website, [www.montrose-trinity.co.uk](http://www.montrose-trinity.co.uk) (here after referred to as 'The Website' or 'our website')

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## SECTION 1 - A NOTE ON NOMENCLATURE

'Montrose Trinity Church' is the nomenclature which has been assigned to define the joining of three former parish churches within the Church of Scotland.

These former parish churches are identified as:

- Montrose: Dun & Hillside
- Montrose: Ferryden & South
- Montrose: Old & St Andrews

The Union of these three parishes became official on 3<sup>rd</sup> August 2023.

As such, any and all mentions of '*Montrose Trinity Church*', '*Montrose Trinity*', '*Trinity*' or '*The Church*' throughout any page of the website [www.montrose-trinity.co.uk](http://www.montrose-trinity.co.uk), and its associated terms and policies, equally applies to the former names identified above.

## **SECTION 2 - DEFINITION OF TERMS**

**Data Controller** - For the purposes of this document, the Data Controller is defined as the person or persons responsible for how your data is processed, stored and used and for what purpose. In the case of this policy, The Church (jointly with the Church of Scotland Presbytery of Perth) is the Data Controller.

**Personal Information** - This includes any information that identifies you personally, such as your name, address, email address or telephone number. When this policy refers to “Personal Information” it is referencing both Device Information and Member Information.

**Device Information** - This refers to any information which is automatically collected by our website upon an individual visiting any page or section of the site.

**Member Information** - This refers to identifying information provided by an individual, either in person, in digital writing, via information or consent forms or via the member area of our website.

**Presbytery** - This is a term for an administrative body within the Church of Scotland. Presbyteries consist of all the ministers in a given district and an equal number of elders, along with members of the diaconate. Montrose falls under the Presbytery of Perth.

## **SECTION 3 - PERSONAL INFORMATION COLLECTED BY THE CHURCH**

### Device Information

When an individual visits our website, the site automatically collects certain information about their device, including information about their web browser, IP address, time zone, and some of the cookies that are installed on their device.

Additionally, as an individual browses The Website, information is collected about the individual web pages that are viewed, which other websites or search terms referred the individual to [www.montrose-trinity.co.uk](http://www.montrose-trinity.co.uk), and information about interactions within our website. This automatically-collected information is referred to as Device Information.

The Church collects Device Information using the following technologies:

- “Cookies” - Data files that are placed on a device or computer and often include an anonymous unique identifier. For more information about cookies, and how to disable cookies, visit [www.allaboutcookies.org](http://www.allaboutcookies.org)
- “Log files” - These track actions occurring on The Website, and collect data including a user’s IP address, browser type, ISP, referring/exit pages, and date/time stamps.
- “Web beacons”, “tags”, and “pixels” - Electronic files used to record information about how users browse The Website.

### Member Information

Both regular and occasional visitors to any of The Church’s buildings, events or services may occasionally be asked to provide personal information. This can take many formats, including but not limited to; in person, in digital format, in writing, via information sheet or via consent form. Personal information may also be gathered by The Church for inclusion in birth, baptism, confirmation, communion, marriage, death and/or funeral registries.

Additionally, when an individual becomes a member through our website, certain personal information is collected, including their name, address, email address, and phone number.

## **SECTION 4 - BASIS FOR PROCESSING PERSONAL INFORMATION**

The Church retains the right to process your personal information in the course of its legitimate activities. This is conducted with appropriate safeguards in place, as a not-for-profit body with a religious aim (GDPR Art 9/2.d) and on the basis that our processing relates solely to members, former members or people who have regular contact with us. Personal information is not disclosed to any third party without your consent.

The Church may also process information where it is necessary for compliance with our legal obligations; where processing is necessary for the purposes of our legitimate interests (and such interests are not overridden by your interests or fundamental rights and freedoms); and where you have given consent to the processing of your information for a particular purpose.

## **SECTION 5 - HOW DOES THE CHURCH USE INDIVIDUAL PERSONAL INFORMATION?**

The Church may use personal information provided as described above in the following ways:

- To administer membership records, including a Communion Roll and Supplementary Roll.
- For pastoral care purposes.
- In relation to participation in Church activities.
- To provide you with information about news, events, and activities within Montrose Trinity, the Presbytery or the wider Church of Scotland.
- To provide the services of a parish church to the local community.
- To fulfill contractual or other legal obligations.
- To manage our employees.
- To further our charitable aims, for example through fundraising activities.
- To maintain our accounts and records (including the processing of Gift Aid applications).
- For the general oversight of Church of Scotland congregations within the Presbytery.
- In relation to participation in Presbytery activities including the training and supervision of ministers, candidates for the ministry and probationers.
- If CCTV is in place within our buildings, we have this for the prevention and detection of crime.

Member Information that is collected via the member sign-up process on The Website is used to generate a profile and grant access permissions within specific areas of The Website.

Additionally, Member's Information may be used to:

- Communicate with individuals
- Screen for bots or fraudulent accounts
- When in line with the preferences individuals have shared with us, provide them with information or advertising relating to Montrose Trinity Church news, services or events.

Device Information that is collected by The Website is used to help screen for potential risk and fraud (in particular, a user's IP address), and more generally to improve and optimise The Church's website.

One example of this would be by generating analytics about how individuals browse and interact with the site in order to assess the success of specific marketing and advertising campaigns.

## **SECTION 6 - SHARING PERSONAL INFORMATION**

The Church will only share your personal information where this is necessary for the purposes set out above. Information will not be shared with any third party outwith the Church of Scotland body without your consent unless or we are obliged or permitted to do so by law.

Our website does share individual's personal information with some third parties. For example, the website is hosted through the platform Wix - for more information about how Wix uses personal information, please visit [www.wix.com/about/privacy](http://www.wix.com/about/privacy).

The Website also uses Google Analytics to help understand how individuals use our site. For more information about how Google uses personal information, please visit [www.google.com/intl/en/policies/privacy](http://www.google.com/intl/en/policies/privacy).

Individuals can also opt-out of Google Analytics here: [www.tools.google.com/dlpage/gaoptout](http://www.tools.google.com/dlpage/gaoptout)

Finally, The Church may also share individual personal information to comply with applicable laws and regulations, to respond to a subpoena, search warrant or other lawful requests for information or to otherwise protect the charity's rights.

## **SECTION 7 - BEHAVIOURAL ADVERTISING**

As described above, The Church uses individual personal information to provide targeted advertisements and/or marketing communications.

For more information about how targeted advertising works, please visit the Network Advertising Initiative's ("NAI") educational page at [www.networkadvertising.org/understanding-online-advertising/how-does-it-work](http://www.networkadvertising.org/understanding-online-advertising/how-does-it-work).

Individuals can opt out of targeted advertising by using the links below:

- Facebook: [facebook.com/settings/?tab=ads](https://facebook.com/settings/?tab=ads)
- Google: [google.com/settings/ads/anonymous](https://google.com/settings/ads/anonymous)
- Bing: [advertise.bingads.microsoft.com/en-us/resources/policies/personalized-ads](https://advertise.bingads.microsoft.com/en-us/resources/policies/personalized-ads)

Additionally, they can opt out of some of these services by visiting the Digital Advertising Alliance's opt-out portal at: <http://optout.aboutads.info/>

Do not track - Please note that Wix does not allow us to alter the website's data collection and use practices when it sees a Do Not Track signal from a user's browser.

## **SECTION 8 - INDIVIDUAL RIGHTS**

European residents have a number of rights regarding their personal information under data protection laws. These are as follows:

- The right to be informed about how your personal information may be used.
- The right of access, commonly known as subject access request (SAR) - this means you have the right to access and receive copies of personal data held about you.
- The right to rectification - this means you have the right to amend incorrect or incomplete data held about you.
- The right to erasure, commonly known as the right to be forgotten (RTBF) - this means you can request all data held about you to be deleted.
- The right to restrict - this links with some of the other rights and means you can request that the organisation restricts processing your data while the issue is resolved, for example if the data is incorrect and the rectification right is exercised.
- The right to data portability - this means you have the right to request an organisation provide your data in a machine-readable format and transfer it to another organisation.
- The right to object - this means you can object to the processing and the Data Controller has to stop unless can prove a legitimate lawful purpose for the processing. The right to object is absolute in relation to marketing.
- Automated individual decision-making, including profiling - The Church does not process data in this way.

If you believe that any information The Church holds about you is incorrect, incomplete or if you do not wish your personal information to be held or used by us please let us know. Any information found to be incorrect will be corrected as quickly as possible.

You have the right to object to our use of your personal information, or to ask us to remove or stop using your personal information if there is no need for us to keep it. There may be legal or other reasons why we need to keep or use your data, but please tell us if you think that we should not be using it.

If we are processing your data on the basis of your explicit consent, you can withdraw your consent at any time. Please contact us if you want to do so.

In order to exercise any of the rights explained above, please contact The Church's Data Protection Officer through the contact information found in section 11 of this policy.

## **SECTION 9 - DATA RETENTION**

The Church will strive to ensure that personal information is accurate and held in a secure and confidential environment.

We will keep your personal information for as long as you are a member, adherent or have regular contact with us or so long as we are obliged to keep it by law. This may include needing it in order to respond to any questions or complaints or to show that we treated you fairly. The Church may also keep personal information for statistical purposes but if so, we will only use it for that purpose.

When personal information is no longer needed by The Church, it will be securely destroyed or permanently rendered anonymous.

## **SECTION 10 - CHANGES TO PRIVACY POLICY**

Updates may be made to this privacy policy from time to time in order to reflect, for example, changes to charity practices or for other operational, legal or regulatory reasons.

## **SECTION 11 - CONTACT INFORMATION AND COMPLAINTS PROCEDURE**

For more information or any questions about Montrose Trinity Church's privacy practices, please contact Ken Linton, Data Protection Officer, via the dedicated GDPR contact form on our website.

If you are concerned about how your personal data is being used by the The Church, you can additionally contact the Church of Scotland Data Protection Officer (DPO) via [privacy@churchofscotland.org.uk](mailto:privacy@churchofscotland.org.uk)

If you are not satisfied with the outcome then you can make a complaint to the regulator of data protection, the UK Information Commissioner's Office (ICO). The ICO has guidance on their website - [www.ico.org.uk](http://www.ico.org.uk)

You can email them at [casework@ico.org.uk](mailto:casework@ico.org.uk) or call them on 0303 123 1113. The ICO can also be contacted via post using the details below:

Customer Contact  
Information Commissioner's Office,  
Wycliffe House,  
Water Lane,  
Wilmslow,  
SK9 5AF

## **SECTION 12 - POLICY NOTE**

This privacy policy shall be governed and interpreted in accordance with the English language, regardless of any translations made for any purpose whatsoever.

For more information regarding the privacy policies of the Church of Scotland as a whole, please visit [www.churchofscotland.org.uk/site/privacy-centre](http://www.churchofscotland.org.uk/site/privacy-centre)

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