

Privacy & Data Security Policy

Policy aims: This privacy notice states how the Methodist Church in the Isle of Man collects and processes **personal data**.

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Document Owner: The Trustees for Manx Methodist Church Purposes (TMMCP)

Data Controller: TMMCP

DPO: Mrs L Whitelegg

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**Sooner if change occurs*

This policy will be circulated to all duty holders (paid and voluntary), all churches and displayed on the website.

Any changes to this policy will result in the policy being recirculated and updated to the website.

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1. Controller and DPO information

1.1 Name and contact details of the organization processing the data.

TMMCP
Isle of Man Methodist Church
District Office
St John's Methodist Church Hall
Main Road
St John's
IM4 3NA
Isle of Man

Tel: 01624 625 408

Email: Administrator@methodist.org.im

1.2 Data Protection Officer (DPO) name & contact.

Mrs Louise Whitelegg
Data Protection Officer
Isle of Man Methodist Church
District Office
St John's Methodist Church Hall
Main Road
St John's
IM4 3NA
Isle of Man

Email: DPO@methodist.org.im

Tel: 07624 474275

2 Data processing details

The **Methodist Church in the Isle of Man** is a membership church, governed through Trustees. Managing Trustees are the Local Church Councils and Circuit Stewards. This privacy notice is issued on behalf of Isle of Man Churches, Circuit and District.

Data is primarily held on the Isle of Man, though there are occasions where your data will be shared with the wider Connexional Team (Methodist Church in Great Britain). This is with regards to certain role applications, safeguarding, complaints or discipline issues, data which is subsequently safeguarded by the Methodist Church in Great Britain [Privacy Policy](#).

2.1 Types of personal data collected.

Personal data, or personal information, means any information about a living individual from which that person can be identified. Below are the types of personal data collected:

- i. **Administrative Data-** i.e. room bookings contacts; invoices; supplier and contractor details, catering / cleaning records.
- ii. **Image Data-** photographic images or video taken of you where it is possible to identify you. Including images of you caught by CCTV.
- iii. **Contact Data-** includes your name, home address, email address and telephone numbers.
- iv. **Employment Data-** i.e. employment history, training records, pension information, tax information, next of kin and other details relating to your employment.
- v. **Financial Data-** bank account and payment card details.
- vi. **Identity Data-** first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- vii. **Demographic information-** postcode, preferences and interests
- viii. **Marketing and Communications Data-** your preferences in receiving information from us about church events and fundraising and our third parties and your communication preferences.
- ix. **Member & Group Data-** your memberships and roles with the Methodist Church in the Isle of Man.
- x. **Parental Contact Data-** Details of parents (e.g. on parent contact forms).
- xi. **Special Categories of Data-** Your race or ethnicity, your religious beliefs, sex life, sexual orientation, information about your health. Sensitive data may be collected in specific cases. These are:
 - o Safeguarding purposes,
 - o Application to become a minister or to hold an office in the Methodist Church, or for employment purposes.

Where data processing relates to **Special Categories of Data** (e.g. health information) the following processing conditions apply:

- Explicit Consent has been given by the data subject.
 - Processing is necessary for carrying out obligations under employment, social security or social protection law.
 - Processing is carried out by the church with a religious aim provided, and there is no disclosure to a third party without consent.
 - Processing relates to personal data manifestly made public by the data subject (person).
 - Processing is necessary for the establishment, exercise, defence of legal claims or where the courts are acting in their judicial capacity.
- xii. **Transactional Data**- Details about payments to and from you, or venue hire, licence agreement or rental agreements that you enter into with us relating to our premises.

2.2 How your data is collected

We use different methods to collect data from and about you including through:

- i. **Direct exchanges.** You may choose to provide personal information to us direct e.g. by speaking to us, by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - Join and take part in Local Church, Circuit or District groups.
 - Become a member of the Methodist Church in Great Britain.
 - Safer Recruitment when applying for paid or voluntary roles within the Methodist Church.
 - Enter into property contracts with us including leases, licence agreements, tenancy agreements and booking forms, including through the Promspace.im website.
- ii. **NOTE: Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
 - Your family members
 - Our ecumenical partners in the case of shared churches and Local Ecumenical Partnerships.

2.3 Purposes for which the data is collected and how it will be used.

We only collect data necessary for the Methodist Church to pursue its objectives, for the effective running of the Church and fundraising, through its staff, trustees and volunteers. This data will be used with regard to: paid and voluntary employment, pastoral care, running events, maintaining memberships, keeping members and supporters informed of our activities and associated marketing.

2.4 The legal basis for processing (e.g., consent, legitimate interests).

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- i. Legitimate interests, as defined under article 6 of GDPR, are the legal basis for processing personal data for achieving the organisation's objectives but not overriding the rights and freedoms of individuals. This means that the Methodist Church operates within a reasonable expectation in processing data, i.e. in a way in which members and attendees would expect their data to be used and in balance with the operational needs of the church. This would include internal communications, pastoral care, administration, safeguarding, training, direct (internal) marketing and compliance needs, this is in balance with the individuals' preferences, expectations and avoidance of harm.
- ii. Where the Church needs to execute contractual requirements. This includes employment, volunteer contracts and property contracts, such as licences and tenancy agreements etc.
- iii. Where we need to comply with a legal or regulatory obligation. This means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.
- iv. In rare cases we may need to use your personal data in the following circumstances:
 - Where we need to protect your vital interests e.g. in an emergency life or death situation where the emergency services are called to treat you when you are with us.
 - Where we need to perform a task carried out in the public interest e.g. in safeguarding situations.

2.5 How long the data will be stored.

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you (i.e. Church census data).

- i. **Opting Out:** You can ask us to stop sending you marketing messages (e.g. messages about church events or fundraising) at any time by following the instructions on the message or by contacting the Data Protection Officer.

You have the right to withdraw consent to the data processing at any time. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent or processing carried out using an alternative legal basis such as performance of a contract or legal obligation.

3 Data sharing and transfers:

3.1 Categories of third parties with whom the data is shared.

We do not:

As a Church we will not share your personal data with any third parties for marketing purposes. If we think that you might be interested in hearing from another Christian denomination, a community group or charity about certain events or fundraising this information will be transmitted via newsletters, internal Methodist communications and the <https://www.methodist.org.im/> website.

We treat all personal data as strictly confidential, except where consent has been provided for it to appear in publications available to general members of the public. Personal data will not be shared with third parties, (unless we are **legally** obliged to do so):

- Without your explicit consent.
- Or it is necessary for law enforcement purposes.
- Or it is necessary to protect our rights, property or safety of our members, ministers, volunteers or staff.

We may:

Share your personal data with the parties set out below.

- i. Internal third parties such as other Methodist organisations which form part of the Methodist Connexion and family, such as Trustees for Manx Methodist Church Purposes (TMMCP) or the UK Connexional Team.
- ii. External third parties such as:
 - Professional advisers including lawyers, surveyors, bankers, auditors and insurers based in the Isle of Man who provide legal, surveying, consultancy, banking, insurance and accounting services.
 - Estate agents who provide advice and administrative support in relation to transactional matters and ongoing residential tenancy matters.
 - IOM Revenue & Customs, regulators and other authorities based in the Isle of Man who require reporting of processing activities in certain circumstances.
 - Our ecumenical partners in the case of shared churches and Local Ecumenical Partnerships.
 - Methodist Church in Great Britain.

3.2 Details on any data transfers to countries outside the EU, including safeguards used.

The Isle of Man implements the European GDPR through the Data Protection Act 2018. In respect of the transfer of data within the EU. We will transfer data to the Methodist Church in Great Britain where there is a legitimate interest to do so. We will only transfer data within the EU with your explicit consent and for the purpose of carrying out the intended purpose and/or under a legally binding contract, including voluntary and paid roles.

4 How we keep your data safe

We implement reasonable and appropriate security measures against unlawful or unauthorised Processing of personal data and against the accidental loss of, or damage to, personal data this is achieved by *all who handle* personal data relating to the Methodist Church complying with the following:

- 1) All volunteers, ministers and staff who handle personal data relating to the Methodist Church adhere to this policy.
- 2) Maintain data security by protecting the confidentiality, integrity and availability of personal data. This is only people who have a need to know and are authorised to use the personal data can access it.
- 3) Personal data is accurate and suitable for the purpose for which it is processed.
- 4) The personal data held is accessible and used by authorised users when they need it for the authorised purposes. Including backing up data.

Further practical advice can be found in appendix 2

5 Data subject rights

5.1 Information on the rights of individuals.

i. Right to Access

The right to request a copy of the personal data which the Methodist Church in the Isle of Man holds about you (commonly known as 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 lawfully processing it. If you would like to exercise this right, then please contact DPO@methodist.org.im

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made several requests. In this case, we will notify you and keep you updated.

ii. Right to rectification

The right to request that the Methodist Church in the Isle of Man corrects any Personal Data which is found to be inaccurate.

iii. Right to erasure

You have the right to withdraw consent to the data processing at any time. The right to request that the Methodist Church in the Isle of Man erases any Personal Data where there is no good reason for us continuing to process it. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

iv. Right to data portability

Where consent or the performance of a contract is used as the legal basis for processing Personal Data, you have the right to request the transfer of your personal data to you or to a third party.

v. Right to object

The right to lodge a complaint with the Information Commissioners Office (ICO).

Isle of Man Information Commissioner

Head Office

PO Box 69

Douglas

Isle of Man

IM99 1EQ

Telephone:

01624 693260

ask@inforights.im

5.2 How individuals can exercise these rights.

If you wish to exercise any of the rights set out above, please contact the Data Protection Officer:

DPO@methodist.org.im Tel: 07624 474275

5.3 Personal Data Breaches.

Should a data subject feel that they have been subject to a personal data breach please notify the DPO without delay DPO@methodist.org.im Tel: 07624 474275.

Should a data processor inadvertently make a data breach (i.e. forgetting to use the bcc function) or be subject to a data attack i.e. ransomware on a computer, loss or theft of a memory stick you must **IMMEDIATELY** notify DPO@methodist.org.im Tel: 07624 474275

Appendix 1

Examples of how we process your data

- To maintain and update lists of officers and groups that are part of the IOM Methodist Church
- Oversight of ministers, including the production of the Minutes of meetings
- Administrative support to committees and other bodies in the Methodist Connexion
- Recruitment to appointments and volunteer posts in the Methodist Connexion
- Safeguarding casework and safer recruitment work
- Dispute resolution
- Conference/events management
- Responding to queries about Constitutional, Discipline and Practice of the Methodist Church in the Isle of Man and the Methodist Church in Great Britain
- Oversight of the Complaints and Disciplinary procedures
- Issuing and arranging the distribution of publications, mailings and newsletters
- Enabling people to participate in campaigns/allowing the administration of campaigns
- Communication with existing/new/potential supporters of the Methodist Church about enquiries relating to giving to/fundraising on behalf and promoting the interests of the Methodist Church
- Managing properties held connexionally by the Methodist Church in the Isle of Man
- Recruitment and Administration of staff and mission personnel
- Financial services:
 - Payment of expenses/invoices
 - Payment of stipends/wages
 - Administering income
- Fulfilling obligations under Health & Safety legislation
- Oversight of Local Preacher training and records
- Administering the candidating process and training of ministers
- Training course administration
- Archiving for research purposes
- To respond to general enquiries

Appendix 2

Data Security Guidance

Who has information?

- Treat all personal data as strictly confidential, except where consent has been provided for it to appear in publications available to general members of the public. Ensure that personal data is only shared amongst those ministers, volunteers and staff members who have a need to know the information to fulfil a specific task.
- Decide who needs to know what and stick to this so that you can keep an eye on who can amend, disclose or delete records.
- Protect databases and workstations with passwords and lock information away as appropriate
- Stop and think – does the information you intend to share need to be shared?
- Use a ‘professional’ address for ministerial, volunteer or officer roles.
- Using a generic email address that does not identify individuals e.g.:
Church-bookingsecretary@[EMAIL PROVIDER].im
– this is also good practice for succession planning.
- Invite people to get in touch using office contact addresses and telephone numbers or “work” mobile phones rather than putting personal data on for example, local Church noticeboards.

Keeping data safe

- Whilst not compromising the security of personal data, make sure a sufficient number of authorised Local Church, Circuit or District officers or ministers know where “Church” personal data is kept should they need to.
- Avoid a situation where if you became ill for example nobody would know where to find the personal data you hold e.g. it was not “accessible”.
- Password protect USB sticks, computers and laptops!
- Use BCC field appropriately – may not be required for a church council but required if the email is being sent to a wide number of members or a Local Church newsletter.
Think: Would the recipients mind the others knowing their email address?

Relevant data?

- The more personal data there is to protect, the more sensitive that personal data is (e.g. if it includes Special Category Data and/or Criminal Offence Data) and the riskier the intended use (processing) e.g. the risk of the personal information falling into the wrong hands, the tighter the security measures will need to be.

- Take a common-sense approach with the emphasis on the time, sophistication and expense of security measures being proportionate to the risk to personal data. Tailor the solution to the level of risk, i.e. Methodist women's luncheon club requires a different level of security to DBS check information

Sensitive data

- Consider using a pseudonym, i.e. replace information that directly or indirectly identifies an individual with one or more artificial identifiers, so that the person, to whom the data relates, cannot be identified without the use of additional information which is meant to be kept separately and secure

Destroy!

- Do not keep information longer than it is required.
- Use a "crosscut" shredder to shred documents containing personal data.

Computer savvy

- Know how to correctly delete emails and computer files.
- Exercise caution in using and relying on any free downloadable applications as they may carry their own security concerns or not be as effective as they suggest.
- Manage your email inbox - emptying email inboxes and recycling folders, deleting information from backups.
- Ensure that "deleted" information is not accessed and does not continue to be used in practice i.e. emails saved to the cloud memory.
- Disposal of old laptops, phones, computers etc – Church owned or personal – that have been used to handle personal data. When any such devices are disposed of, recycled or given to a relative etc. make a written record, of who you are handing the devices and what steps you took to erase/delete the personal data on them.

Final thought

When considering what measures to take think what is *reasonable* and *appropriate*. This depends on the type and volume of personal data you are dealing with and the damage and distress likely to be caused to the data subject in the event of a personal data breach.

Appendix 3

Social Media Guidance

These guidelines apply to all content and comments posted to Methodist Church social media channels. Methodist churches, circuits and districts, post holders and members are strongly encouraged to adopt these guidelines for their own social media channels and personal social media engagement.

1) Safety -

The safety of children, young people and vulnerable adults especially, must be maintained. Which means no unauthorised posts, or posts that give away personal information.

- If you have a safeguarding concern or query, please contact the **district safeguarding officer**.

2) Disagreement and heated comment –

If you have a criticism you need to make, consider carefully the tone of what you write. If you are personally attacked, do not respond in kind. Being a Christian means that sometimes we must speak out and challenge injustice. But remember when you need to point out something you think is wrong, that there is a real, and possibly vulnerable, person at the receiving end of what you say.

The remote nature of social media means people can feel uninhibited in their comments. Posts and comments are frequently only partially read, or the context misconstrued or misunderstood. Which can contribute to hurtful or heated argument. Be aware of your personal feelings and response. Do not feel you always need to engage consider:

- For professional posts: “We are committed to [Value/Mission] and thank you for your input. With Grace & peace.” Or “We appreciate the feedback, please contact X to discuss further”
- For personal posts: ‘Sign off’ from a heated conversation calmly, with something like ‘I think we’ll have to agree to disagree. Peace.’

3) Respect-

Do not post or share content that contravenes the fundamental beliefs of the Methodist Church, embrace and extend the concept of a safe place of mutual care, where all people feel valued, loved and respected to social media. Do not share anything that is sexually explicit, inflammatory, hateful, abusive, threatening or otherwise disrespectful. Think of the effect on others who may see your post.

4) Be relevant

Don't add comments to a social media post that are irrelevant to the topic. Engage in the conversation rather than broadcasting opinions and do not mislead people about who you are or use nicknames.

5) Be careful & considerate when sharing content

Don't share in haste! Read linked content thoroughly or watch a video to the end so you know exactly what you are sharing, before you judge whether it is suitable to share either as a role holder, member of the Church or just within your context – not everyone you share to has your sense of humour. Also be conscious of copyright. Seek permission where required.

6) Maintain confidentiality

If telling a story about someone else, ask yourself first '*Is this my story to tell?*' Don't reveal personal details about others without their explicit permission.

Further information:

<https://www.methodist.org.uk/for-churches/digital-church/>