

DATA PRIVACY NOTICE

WELLS CATHEDRAL

Wells Cathedral values the personal information you provide to us, and your privacy is extremely important to us. Please read this privacy notice as it provides you with details on how we collect and use your personal information.

For the purposes of data protection, the Chapter of Wells Cathedral is the data controller. Contact details are below. It decides how your personal data is processed and for what purpose.

Who are we?

Wells Cathedral is an ecclesiastical corporation: the seat of the Bishop of Bath & Wells and a centre of worship, choral music and mission. It is a focal point for services and celebrations for those worshipping in churches throughout the diocese and is a spiritual space for people of all faith, no faith or any faith. It is also a unique and priceless heritage asset, attracting visitors from across the world. Wells Cathedral also offers facilities for visits by schools and is an immensely rich learning resource for children and adults. Very significant numbers of volunteers assist in keeping cathedrals open for the public to enjoy.

Wells Cathedral is comprised of:

- The Cathedral Church of St Andrew in Wells, known as Wells Cathedral (Charity number: 1207269)
- The Corporate Body of Wells Cathedral (Exempt Charity, HMRC Charity Reference Number X7886)
- Wells Cathedral Publications Ltd. (Company registration number 01007081)
- Wells Cathedral Catering Ltd. (Company registration number 01772974)
- Wells Cathedral Enterprises Ltd. (Company registration number 01778666)

Your personal data

Personal data means any information relating to an identified or identifiable natural person (known as the “data subject”). The processing of personal data is governed by the UK General Data Protection Regulation and the Data Protection Act 2018. (“UK GDPR”).

Why do we hold your personal data?

Wells Cathedral holds your personal data:

- To support the mission of the Church of England, the Diocese of Bath & Wells and its Bishops.
- To raise funds to ensure the Cathedral remains open and fit for purpose to fulfill all its various roles.
- To manage its workers and volunteers.

- To maintain its accounts and records (including the processing of gift aid claims).
- To inform you of news, events, activities and services at Wells Cathedral.
- To manage safeguarding and the provision of safeguarding training.
- To manage the website.
- To manage the security of key areas of the Cathedral by using CCTV.
- To enable the purchase of tickets and goods in the Cathedral Shops.
- To manage enquiries or complaints from people who approach the Cathedral for any reason.

What data do we hold?

To enable us to support the mission of the Church of England, the Diocese of Bath & Wells, we have a legitimate interest in holding the personal data of:

- Chapter members.
- Committee members of the bodies required by the Constitution and Statutes of the Cathedral and any sub-groups.
- Schools, including contact details of key contact points and, in the case of Wells Cathedral School, choristers and chorister parents.
- Cathedral workers.
- Cathedral volunteers.
- Job applicants.
- Cathedral contractors.
- Ticket bookers, event participants and Cathedral card holders.
- Current and potential donors and supporters.
- The Cathedral Community Roll.
- People signed up to our mailing lists.

For more information about how our payment processors use your data, please view the appropriate privacy policy:

- Natwest Bankline: <https://personal.natwest.com/global/privacy.html>
- BACS: https://www.bacs.co.uk/Pages/PSW_Privacy_Statement.aspx
- Worldpay: <https://www.worldpay.com/uk/worldpay-privacy-notice>
- Square: <https://squareup.com/gb/en/legal/general/privacy>
- Eventbrite: https://www.eventbrite.co.uk/support/articles/en_US/Troubleshooting/eventbrite-privacy-policy
- JustGiving: <https://www.justgiving.com/about/info/privacy-policy>
- GoodBox: <https://www.goodbox.com/privacy-policy/>

In addition to our listed payment processors, we use secure internal systems to manage financial and retail operations:

- Xero (cloud-based accounting software): Used for maintaining financial records, processing payroll, and managing supplier payments. Xero may store data outside the UK in secure data centres, subject to appropriate safeguards. See Xero's privacy policy here: <https://www.xero.com/uk/about/legal/privacy/>.

- *K3 EPOS: Used in our Cathedral shops to manage sales and point-of-sale data. K3 integrates with Worldpay to handle card payment processing. We do not store full card details locally.*

Both systems are governed by robust security measures and contractual safeguards to ensure compliance with UK data protection laws.

What personal information do we collect from you?

We collect the following types of personal data:

- Personal identification data: This includes your name, title, date of birth, and gender.
- Contact information: This includes your postal address, email address, and phone number.
- Family details in some circumstances (e.g partners name).
- Office or role in the Cathedral.
- Courses or training events attended.
- Financial information: Details where needed, to make payments. For processing payments and donations, we collect payment details (such as bank account or credit card information), donation amounts, and Gift Aid declarations.
- Philanthropic history: We keep a record of your donation history, event attendance, and other philanthropic involvement with Wells Cathedral or similar organisations.
- Publicly available information: For major donor prospect research, we may collect data from publicly available sources such as Companies House, charity registries, public social media profiles, or property records.
- Preferences and interests: We may collect information on your interests and preferences to tailor our communications and fundraising appeals to you.
- Engagement data: This includes records of communications we have sent you and your interactions with our emails, website, and social media channels.

How Data is collected

We collect data in the following ways:

- Directly from you: This includes data you provide when booking a ticket, signing up for events, communicating with us or subscribing to our communications, donating or completing a Gift Aid declaration.
- Through our website: Data may be collected via cookies and other tracking technologies when you visit our website or use our online donation platforms. For more information about Cookies please visit: www.allaboutcookies.org
NOTE: You can set your browser not to accept cookies, and the above websites tell you how to remove cookies from your browser. However, in a few cases, some of our website features may not function as a result.
- From third parties: We may receive data from third-party platforms like payment processors when you make a payment or donation through their services.
- From Publicly Available Sources: For prospect research and wealth screening of potential major donors, we may collect data from publicly accessible databases, social media platforms, and other open sources.

- Via Surveys and Forms: We may collect additional information through surveys or forms that you complete, such as feedback on our events or campaigns.
- When you apply for a job or voluntary position with Wells Cathedral.
- Event management: We use Eventbrite to manage ticket sales and event registrations. Personal data provided through Eventbrite is processed securely and in line with their privacy policy.

Why we collect personal data and how we use it

We collect your data for the following purposes:

- Processing donations: To securely process your donation and comply with legal obligations such as claiming Gift Aid.
- Processing payments: We process personal and bank information for the purpose of paying suppliers and contractors, and to fulfil financial audit and reporting obligations.
- Communications: To keep you informed about our work, upcoming events, fundraising appeals, and how your donations are making an impact, based on your communication preferences.
- Event management: To manage your participation in our events, including ticket sales, access arrangements, and follow-up communications.
- Compliance: To meet our legal obligations, including auditing, reporting, and maintaining accurate donation records in line with HMRC guidelines (e.g., for Gift Aid claims).
- Improving donor experience: We use data to analyse donor behaviour and preferences, which helps us improve the way we engage with our supporters and ensure we are providing the best possible experience.
- Fundraising and philanthropic engagement: To tailor our fundraising appeals to your interests and giving capacity, particularly in the case of major donors. This includes using data for prospect research to identify potential supporters whose philanthropic goals align with Wells Cathedral's mission.

We use your personal information to:

- Provide you with information about products or services you have requested from us, which we feel may interest you within your consented contact preferences. We may also use your data to carry out our obligations to you from any contract entered into between you and us.
- We may share your data with third parties where they are processing your personal data on behalf of Wells Cathedral (for example, in the distribution of a mailing to which you have subscribed), and always in line with our privacy policy.
- We may also share your personal data where we are required to do so by law.
- We will never sell or rent your personal data to third parties for their own marketing, market research or commercial purposes.
- We do not store your full payment details when you make donations or payments via our website using our payment providers.
- We will continue to use your data for as long as you are in contact with us. If we lose touch, your data will be held for no more than three years from your last inbound contact, other than where we have a statutory requirement to store it for longer.
- Should you ask us to delete your personal information we will do so, other than where we have a statutory requirement to hold it for a set period of time.

Special fundraising provisions

Major donor fundraising & prospect research

On occasion and to support our fundraising efforts, Wells Cathedral may collect information about potential major donors from publicly available sources. This is known as 'prospect research' and involves gathering data such as biographical information, philanthropic history, financial capacity, and connections to causes similar to our mission. It might also include using trusted third-party partners that can help us to research individuals and organisations that might want to support the Cathedral and its charitable activities. We may also use publicly sourced images to help identify individuals who attend our events. This enables us to identify shared interests and connections and make appropriate invitations and fundraising approaches to those who may be able and willing to support the Cathedral, aiding us in our fundraising and helping the Cathedral to achieve its charitable objectives.

We rely on legitimate interest as our legal basis for conducting this research, ensuring that it helps us achieve our fundraising goals in an ethical and respectful manner. Individuals have the right to opt out of this type of research at any time by contacting us at data@wellscathedral.org.uk.

We may use data profiling and segmentation techniques to analyse your engagement with Wells Cathedral and tailor our communications to you. Profiling helps us identify which donors are most likely to support certain projects or campaigns based on their donation history, interests, and interactions with our content. We also use segmentation to ensure that our appeals are relevant and appropriate to each donor's preferences and capacity. You have the right to opt out of profiling at any time by contacting us at data@wellscathedral.org.uk.

Due diligence research

The Cathedral may carry out due diligence on individuals and organisations before it seeks or accepts major donations to ensure compliance with legislation, financial rules, international agreements, and guidance from statutory bodies and its own Ethical and Fundraising policies, to protect it from reputational risk, as required. These legal and regulatory obligations mean that if you object to analysis of your data for the supporter research purposes detailed above, we may still conduct some required due diligence research in order for us to accept donations from you.

Donor consent for communications

When you make a donation or express interest in our work, we will ask for your consent to keep you updated by email on how your support is making a difference, upcoming events, and future appeals. You can choose how you would like to hear from us and update your preferences at any time by contacting us at data@wellscathedral.org.uk.

We may also send you marketing or fundraising material or information where there is a legitimate interest to do so. In some circumstances, such processing does not require opt-in consent but your right to object remains, you can do this by contacting data@wellscathedral.org.uk

Data use for Donor recognition

From time to time, we may publicly acknowledge the generosity of our donors in publications, reports, and other materials. We will always seek your explicit consent before publicly recognising your support. Should you prefer to remain anonymous, we will respect your wishes.

Online and contactless donations

If you choose to donate via contactless devices in the Cathedral or through our digital platforms such as JustGiving, your payment information is securely processed by trusted third-party service providers such as Worldpay/Goodbox/Just Giving/CAF/Square. We do not store your full payment details, but we may retain your name and donation amount for record-keeping and stewardship purposes, in line with our data retention policy. We will also use this information to claim Gift Aid, where applicable, if you have provided the necessary consent.

Data sharing

In order to carry out our activities effectively we may share your personal information with trusted third-party service providers who are performing services on our behalf. For example, processors handling payments, email providers for our marketing communications, ticketing providers, and third-party advertisers. These third parties are carefully vetted, and we ensure that they handle your data securely and in line with our privacy standards.

We may share limited data to collaborate with/and assist other linked organisations closely connected with the ministry of Wells Cathedral, such as the “Friends of Wells Cathedral” and the “Wells Cathedral Chorister Trust”.

We may share your personal information where required to do so for the prevention and/or detection of crime or for taxation purposes or where otherwise required to do so by the law and/or regulators.

We will not sell your data or share personal data with third party organisations for their own marketing purposes.

We are committed to keeping your personal information secure.

Personal data transfers outside of the UK

It is sometimes necessary for us to transfer your personal data outside the UK. This might arise where, for example, our service providers are located outside the UK. Any transfers of personal data outside the UK are subject to special rules set out in the UK GDPR. Where we transfer your personal data outside the UK, we will ensure that the level of protection of personal data guaranteed by the UK data protection laws is not undermined by either:

- establishing that the transfer is based on adequacy regulations (for example, transfers to the European Economic Area countries), or
- establishing that, in the absence of adequacy regulations, the transfer is based on one of the appropriate safeguards referred to in Article 46 of the UK GDPR and ensuring that your personal data is treated by third parties in a way that is consistent with, and which respects the UK data protection laws (for example, when we have entered into a contract with the

receiver incorporating standard data protection clauses recognised or issued in accordance with the UK data protection laws), or

- establishing that, in the absence of adequacy regulations or of appropriate safeguards pursuant to Article 46 of the UK GDPR, one of the exceptions set out in Article 49 of the UK GDPR applies to the transfer (for example, the transfer is necessary for important reasons of public interest).

If any of your personal information is transferred to, and stored at, a destination outside the UK or the European Economic Area (EEA), we ensure that appropriate security safeguards are in place, such as Standard Contractual Clauses (SCCs). For example, we use Xero, a cloud-based accounting system which may store data outside the UK in secure data centres. In all such cases, your data is protected in accordance with UK data protection laws. You can request more information about the third parties we work with at any time.

If you would like more information about how we protect your personal data if it is transferred outside the UK, please email us at data@wellscathedral.org.uk.

Data Retention

We retain your personal data only for as long as necessary to fulfil the purposes for which it was collected, including for the purposes of satisfying any legal, accounting, or reporting requirements. The retention period for your personal data will vary depending on the type of data and the purposes for which we collected it. After this period, we will securely delete or anonymise your data, unless we are required to retain it for longer to comply with our legal obligations.

The purpose for which personal data is being processed by us and the legal basis on which we rely to process personal data inform our retention policy.

Different retention periods apply to different types of personal data.

In general, retention periods are based on:

- statutory requirements (for example, records of any reportable incident under regulations 4-7 of the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 must be kept for a minimum of three years from the date on which the record was made),
- other legal obligations,
- or limitation periods related to any legal claims which may be brought by the data subject (for example, claims for breach of contract can be brought in the civil courts at any time within six years of the alleged breach).

If you would like further information about our retention periods, please email us at data@wellscathedral.org.uk.

Legal basis for using your personal information.

There are a number of ways that we may have a legal basis to use your personal information.

- Most of the data is processed because it is necessary for the cathedral's legitimate interests. Examples of this would be to deliver the Cathedral's mission to the community; its safeguarding work to protect children and the vulnerable at risk; to carry out work with Cathedral volunteers, charitable activities and fundraising; and to administer the Cathedral.

We will always take into account the interests, rights and freedoms of those whose personal data we collect.

- Some of the Cathedral's processing is necessary for compliance with a legal obligation, for example the requirements of the Cathedral Constitution and Statutes include the administration of the Community Roll or collating signing-in details at some Cathedral activities to comply with health and safety activities.
- The Cathedral may process data if it is necessary for the performance of a contract, or to take steps to enter into a contract. Examples of this would be processing information relating to professional contractors and suppliers.
- The Cathedral may send out information where you have expressly provided your consent to Wells Cathedral to be contacted for a specific purpose e.g. by subscribing to a defined mailing list or area of interest.
- Churches are also permitted to process information about a person's religious beliefs to administer membership of groups or contact details.

Keeping your personal information secure

The Cathedral complies with its obligations under UK GDPR and the Data Protection Act 2018 by:

- Keeping personal data up to date (we rely on you to help the Cathedral do this by letting us know of changes).
- Storing it securely.
- Only collecting the data needed for specific purposes and not using it for any other purpose without consent.
- Only collecting the data we need for the purpose we are using it.
- Protecting personal data from loss, misuse, unauthorised access and disclosure.
- Ensuring that appropriate technical and organisational measures are in place to protect personal data.
- We take the security of your financial information very seriously. Whether you make a payment or donation online or in person, we use advanced encryption and secure payment platforms to ensure your data remains protected. Our staff undergoes regular training in data protection practices, and we conduct frequent audits of our systems to maintain the highest standards of security. Access to financial systems and sensitive data is strictly controlled and limited to authorised personnel only. Role-based access controls ensure that only those with a legitimate need to view or process financial information are granted access.

Access to your data

Unless subject to an exemption under UK GDPR and the Data Protection Act 2018, you have the following rights with respect to your personal data:

- The right to request a copy of your personal data which the Cathedral holds about you (this is called a "data subject access request", for which we have a separate policy).
- The right to request that the Cathedral corrects any personal data if it is found to be inaccurate or out of date.
- The right to request that the Cathedral erases your personal data where it is no longer necessary for it to retain such data.
- The right to withdraw your consent to the processing at any time.

- The right to request that the data controller provide the data subject with his/her personal data and, where possible, to transmit that data directly to another data controller (known as data portability).
- The right, where there is a dispute in relation to the accuracy of processing of your personal data, to request a restriction is placed on further processing.
- The right to object to the processing of personal data (where applicable).
- The right to lodge a complaint with the Information Commissioner's Office.

How to contact us

Please contact us if you have any questions about our privacy policy:

- By email to Ruth Clacee-Rowe at data@wellscathedral.org.uk
- Write to us at: Wells Cathedral Offices, 1st & 2nd Floors, 16 Market Place, Wells, Somerset. BA5 2RB.
- Telephone 01749 674483

You can contact the Information Commissioner's Office (ICO) on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.