Legitimate Interests Statement

Background
Following the introduction of the General Data Protection Regulation (GDPR) on the 25 May 2018 Worcester Cathedral decided to use the following legal bases for processing your personal data,

- Explicit consent of the data subject so that we can keep you informed about Cathedral news, events, activities and services and keep you informed about other events and activities hosted or arranged by Worcester Cathedral or its entities;

- Processing is necessary for carrying out legal obligations in relation to the Cathedrals Measure 1999, Gift Aid or under employment, social security or social protection law, or a collective agreement;

These choices meant that we were introducing an 'Opt-in' policy for communicating with you, our donors and supporters. It was felt that these choices reflected your best interests and the best interests of the Cathedral, and were in-line with the choices being made by other organisations in the charitable sector at that time.

As a consequence of this policy the number of donors and supporters that we have been able to contact since May 2018 has been dramatically reduced. This is not because you are unwilling to hear from us, it is because our initial choices meant that we had to immediately stop direct mail communication with you. As a result we have not being able to tell you about our work and you have not been offered the opportunity to support the Cathedral.

Following the impact of COVID-19 on our income, and fundraising in particular, Worcester Cathedral Chapter have reviewed the legal bases for processing personal data and agreed to retrospectively apply Legitimate Interests to our database, and the personal data stored on our internal computer system, for a period of up to 6 years from 1 June 2020.

Any individual that has opted-out of communications previously, where known, will be excluded from the application of Legitimate Interest, retrospectively or otherwise.

A Legitimate Interest Balancing Exercise to justify the decision to move to Legitimate Interest was carried out (Legitimate Interests Assessment for Worcester Cathedral).

Statement on Legitimate Interests
On 25 May 2018 a new data protection law, the General Data Protection Regulation (GDPR), came into force. This law outlined a number of lawful reasons that we can use (or 'process') your personal information. One of the lawful reasons is called 'legitimate interests'.

'Legitimate Interests' means that we can process your personal information if we have a genuine and legitimate reason to do so, and we are not harming any of your rights and interests. When you provide your details to us, we use your information for our legitimate business interests to carry out our work as a place of worship, a visitor attraction, an events and education provider, a fundraising organisation and other roles associated with Cathedral life. Before doing this we will also carefully consider and balance any potential impact on you and your rights.

Clear information on how you can opt out of contact or change your preferences is contained within our Privacy Notice on our website www.worcestercathedral.co.uk or see below.

Our Legitimate Interests
The following are examples of when and why we may process your personal information for our legitimate business interests to support us in our work as an active Cathedral and which enable is to enhance the services that we provide.

- To enable us to provide a voluntary service for the benefit of the public in a particular geographical area as specified in our Constitution;
- To administer the Cathedral Community records (also known as the electoral roll) and benefactor records;
- To provide pastoral care to Worcester Cathedral's congregations;
- To fundraise for, promote the interests of, and administer the business of Worcester Cathedral, its charitable trusts and its trading entities;
- To manage our clergy, employees, volunteers and tenants;
- To maintain and audit our own financial accounts and records and process gift aid applications;
- To inform you of news, events, activities and services at Worcester Cathedral;
- To contact individuals via surveys to conduct research about their opinions of current services, events and facilities or of potential new fabric developments that may be offered;
- To operate the Worcester Cathedral web site and deliver the services that individuals have requested online;
- To operate the Worcester Cathedral Online Shop and deliver the products that individuals have purchased online;

Our processing also includes the use of CCTV systems for the prevention and detection of crime.

Whenever we process data for these purposes we will ensure that we always keep your Personal Data in high regard and take account of your rights and interests. You have the right to object to this processing. If you wish to do so please contact the Cathedral's Chief Operating Office at Worcester Cathedral, Chapter Office, 8 College Yard, Worcester WR1 2LA or email info@worcestercathedral.org.uk.

Your Interests
When we process your personal information for our legitimate interests, we will consider and balance any potential impact on you and your rights under data protection and any other relevant law. Our legitimate business interests do not automatically override your interests – we will not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

For more information on 'Your rights and your personal data' please see our Privacy Notice.

We will retain your data for as long as the active relationship lasts, for fundraising, business analysis and administration purposes, as detailed in our Privacy Notice.

We will never sell your data to a third party.

If you have informed us of your preferences and permissions for communication before this date, November 2020, then your preferences will still apply.

Clear information on how you can opt out of contact or change your preferences is contained within our Privacy Notice on our website www.worcestercathedral.co.uk

For more information about what information we hold and how we use it, please refer to our Privacy Policy.