
Full Policy Text Ready for Copying



Data Protection & Ethical Stewardship Policy Statement

Stewardly – Empowering Churches through Ethical, Secure Data Management

1. Purpose

Stewardly is committed to protecting the personal data of its clients—UK churches, dioceses, and faith-based organisations—in accordance with the **United Kingdom General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**. This policy outlines our approach to data protection, ethical stewardship, and regulatory compliance.

2. Our Commitment

As ethical data stewards, we commit to:

- Lawfully and transparently processing personal data
 - Limiting data collection to what is necessary
 - Maintaining accurate, secure, and up-to-date records
 - Respecting data subjects' rights, including access, correction, and erasure
 - Supporting churches in becoming GDPR-compliant
-

3. Our Legal Basis for Processing

We process personal data on behalf of clients under the following UK GDPR bases:

- **Consent** – Where individuals have freely and explicitly agreed
 - **Contractual necessity** – To provide agreed services (e.g. CRM setup)
 - **Legal obligation** – For regulatory requirements (e.g. SAR responses)
 - **Legitimate interests** – Supporting church operations while safeguarding rights
-

4. Data Types We Handle

In line with **Article 9** of UK GDPR, we recognise that we may process **special category data**, including:

- Religious affiliation
- Health and accessibility information
- Giving and attendance records

We implement **heightened safeguards** for this data.

5. Key Data Protection Principles

We operate according to UK GDPR **Article 5** principles:

1. Lawfulness, fairness, transparency
 2. Purpose limitation
 3. Data minimisation
 4. Accuracy
 5. Storage limitation
 6. Integrity and confidentiality
 7. Accountability
-

6. Individual Rights

We uphold the following rights for data subjects:

- Right to be informed
- Right of access (SARs)
- Right to rectification
- Right to erasure (“Right to be Forgotten”)
- Right to restrict processing
- Right to data portability
- Right to object
- Rights related to automated decision-making and profiling

We respond to rights requests **within one month**, as required by law.

7. Roles & Responsibilities

- **Data Controller:** Stewardly clients (e.g. individual churches)
- **Data Processor:** Stewardly, on behalf of clients
- **DPO (Data Protection Officer):** Appointed part-time to oversee compliance
- **Founders:** Mr. Chukwuemeka Umunna & Mrs. Iyanuloluwa Folorunso ensure implementation and oversight

8. Security Measures

- UK-based, GDPR-compliant hosting providers
- Role-based access to CRM data
- Encryption at rest and in transit
- Secure authentication and logging
- Regular data backups
- Data Protection Impact Assessments (DPIAs) where needed

9. Breach Notification

We will notify affected clients and the ICO of any **data breach within 72 hours**, in accordance with UK GDPR Articles 33–34.

10. Data Retention

Personal data is retained **only as long as necessary** for the client's purposes. We support churches in implementing appropriate **retention schedules and erasure protocols**.

11. Subprocessors

All third-party service providers (e.g., cloud hosting, CRM support) are:

- Vetted
- Bound by contract

- GDPR-compliant
-

12. Policy Review

This policy is reviewed **annually** or upon major regulatory or service changes.

Summary Statement

Stewardly is a faith-driven data partner, empowering churches to handle personal data ethically, securely, and in full alignment with the UK GDPR.

Would you like me to try again later to generate the Word document file, or send you the Markdown version for upload to your site or system?