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📄 **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.

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