**ALL SAINTS CHURCH**

**DATA USE POLICY**

**INTERNAL**

* Information contained in All Saints’ financial records is confidential and not be shared without the permission of the Parish Administrator.
* Data about parishioners and donors and their giving to All Saints Church is held in the strictest confidence.  The Rector will determine, on a need-to-know basis, which staff members have access to these data.
* Staff members with access to these data will annually sign a Confidentiality Statement.

**EXTERNAL**

Any known data about All Saints Church parishioners and donors may be provided to an external organization only under the following conditions.

* The data will be provided only when it is clear that engaging an external organization or consulting firm to utilize, manage, and/or analyze the data will demonstrate a significant and unique benefit to the All Saints Church community, and when there is a situation in which All Saints is not adequately staffed or equipped.
* The external organization receiving the data will use it only for the expressed purpose, will not share the data with or sell it to any other organization, and will not use the data to contact All Saints parishioners and/or donors for any reason.
* All Saints is exempt from the California Consumer Privacy Act (eff. 01/2020), according to legal counsel. Nonetheless, attention will be paid as best practices evolve regarding the release of personal data.
* The decision to provide parishioner and/or donor data will be made by the Rector consistent with the guidelines of this policy.

Draft: 10/1/19