

## **First Parish Brewster Unitarian Universalist Policy**

**Policy Title:** Use and Protection of Personal Data

**Policy Number:** 6.6

**Purpose:** This policy deals with access to, and the use and protection of, personal data in FPBUU records.

**Revisions:** 5/20/2025

**Board Review Date:** 6/21/2022, 5/20/2025

**Congregations' Review Period:** 6/24/2022 through 7/24/2022

**Effective Date:** 5/20/25

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### **POLICY STATEMENT**

This policy deals with access to, and the use and protection of, personal data in FPBUU records.

Types of records containing personal information:

FPBUU records that contain personal data ("Records") include:

- a) FPBUU's directory of members and friends, currently maintained in Breeze ("Directory");
- b) Mailing lists, currently maintained in Breeze and MailChimp ("Mailing Lists");
- c) Records of pledges and contributions to FPBUU ("Contribution Records");
- d) Background checks of FPBUU staff, prospective staff and volunteers, including signatories on bank accounts and Thrift Store volunteers ("Background Checks"); and
- e) Evaluations and employment records of staff ("Personnel Records").

### **PROCEDURES**

#### **1. Use of and Access to Records**

- a) Records may never be used for:
  - solicitations (whether commercial or non-profit) that are not related to FPBUU's activities or operations,
  - endorsements of political candidates,
  - any use that might encroach on the principle of separation of church and state, or
  - anything else that would constitute an abuse of privacy.
- b) The Directory may be used by members, friends and staff for personal and FPBUU purposes only (including to provide the UUA with an updated list of FPBUU's membership).

- c) The Mailing Lists may not be shared with other organizations or persons. They are to be used by staff in accordance with FPBUU's Communications Policy.
- d) Contribution Records of individuals may be accessed only by:
  - FPBUU's minister, Administration & Finance Director ("AFD")
  - As approved by the Board of Trustees, FPBUU members who may require information for purposes of soliciting funds for FPBUU (such as members of the Stewardship Committee).Such Records shall be kept confidential, except as permitted by the contributor. Aggregated pledge and contribution information that does not identify individuals may be shared with members and other appropriate recipients.
- e) Background Checks may be accessed only by the minister, AFD and (for checks on religious education volunteers and staff) the Lifespan Religious Education Director. Such Records shall be kept confidential except as necessary for the supervision of staff and volunteers.
- f) Personnel Records may be accessed only by the minister and AFD. Such Records shall be kept confidential except as necessary for the supervision of staff. Requests for information concerning past or present staff (e.g. from prospective employers) must be directed to the AFD.

## **2. Protection of Records**

- a) Securing Records:
  - Hard copies of Records shall be kept in a locked cabinet.
  - Digital copies of Records shall be maintained on servers with a high level of security. All passwords to access digital Records shall be changed at least annually.
  - Security on FPBUU's website shall be updated as recommended by the website host.
- b) Records Retention:
  - Directory and Mailing Lists shall be retained for such period as permitted by the software used to maintain the list.
  - Contribution Records shall be maintained for a period of 7 years from the end of the year in which they are produced.
  - Background Checks shall be maintained for a period of 7 years after a staff member or volunteer leaves such position or, in the case of a prospective employee not hired, 7 years after the date employment is not offered or is turned down.
  - All applications for employment, both for those hired and those not hired, shall be maintained for 7 years.
  - Personnel Records shall be maintained for a period of 7 years after termination of employment of a staff member.

## **3. Responsibility for Securing and Retention of Records**

The AFD shall be responsible for implementing and monitoring this Policy. There should be a review by the AFD at the beginning of each fiscal year (in July or August) to determine that these procedures are being followed.

## **GUIDELINES**

No guidelines are recommended at this time.

**STANDARDS**

No standards are recommended at this time.

**DEFINITIONS**

All definitions are included above under "Policy Statement."