

# Churchcentral Trust: Our Privacy Notice



**Approved by Directors: July 2019**

## **1. Introduction**

Churchcentral values everyone who engages with us by whatever means, and we do all we can to protect your privacy and to make sure the personal data you provide us is kept safe. This policy explains how we collect data, how we use and store information and what it means for you.

## **2. Who we are**

Churchcentral is the data controller (contact details below). This means it decides how your personal data is processed and for what purposes.

Churchcentral  
Central House  
13 Ravenhurst Street  
Birmingham  
B12 0HD

Charity Number: 1118562

Company Number: 5834930

## **3. What information we collect**

This privacy notice explains how Churchcentral and its website comply with the DPA (Data Protection Act) and the General Data Protection Regulation (GDPR). Churchcentral complies with its obligations under the GDPR by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

### **a. Directly from you**

We collect personal information each time you deal with us, for example when you provide your contact details in writing to church staff or volunteers; request materials or information; sign up for an event; make a donation; use our check in system for you or your children, or otherwise provide your personal details.

### **b. From website interaction from you**

We collect non-personal data such as IP addresses, details of pages visited and files downloaded. Website usage information is collected using cookies, see the section on Cookies below.

**c. Indirectly from third parties**

We collect information from third parties such as Stewardship, where you have agreed to support Churchcentral and have given your consent. You may wish to check their privacy policy to find out more information on how they will process your data.

**d. Where you give permission to other organisations**

We may collect information that you make available on, for example, Twitter, Facebook or similar organisations. You may wish to check their privacy policy to find out more information on how they will process your data.

**e. Sensitive data**

Where you provide the information, we may collect sensitive personal data, including, but not limited to, your religious beliefs, or your physical or mental health.

**4. What we do with it**

**a. Processing of requests/donations**

As detailed above, we collect personal information when you deal with us. We may use the data we collect:

- To inform you of news, events, activities and services running at Churchcentral;
- To enable us to provide a voluntary service for the benefit of the public;
- To provide pastoral care to our attendees;
- To administer attendance/membership records;
- To provide an interactive website where email is used to communicate with users;
- To raise funds and promote the interests of the charity;
- To manage our employees and volunteers;
- To maintain our own accounts and records (including the processing of Gift Aid applications);

**b. Basis of processing your data**

So that we can provide services you have requested, and keep you informed about news, events, activities and services and process your donations, we will process your personal data on the basis of the consent you provided us with. You are free to change your preferences at any time.

Other processing based on legitimate interest is necessary for carrying out obligations under employment, social security or social protection law, or a collective agreement. Legitimate interest is also the basis of our processing relating to members or former members (or those who have regular contact with us in connection with these purposes) and for claiming back tax under the government's Gift Aid scheme, as we are a not-for-profit body with religious aims.

**c. Applying for a job or volunteering with us**

Where you provide personal data and sensitive personal data when applying for a job or volunteer role with us, such as the information on your CV, we will process, store and disclose the personal data we collect to:

- Support the recruitment process;
- Answer any questions you may have;
- Use third parties to provide services such as references, qualifications, criminal referencing, checking services, verification of information you have provided, health screening and psychometric evaluation or skills tests;
- Provide anonymised data to monitor compliance with our equal opportunities policy.

## **5. How and where we store your information**

### **a. How long?**

We will keep your personal information only for as long as we consider it necessary to carry out each activity. We have a data retention policy to implement this. We take account of legal obligations and accounting and tax considerations as well as considering what would be reasonable for the activity concerned.

### **b. Security**

We ensure that we have appropriate technical controls in place to protect any personal data you provide. For example, we ensure that any online forms are encrypted and our network is protected and routinely monitored. We ensure that access to personal data is restricted only to those staff members or volunteers whose job roles require such access and that suitable training is provided for these staff members and volunteers.

We may make limited use from time to time of external companies to collect or process personal data on our behalf. When we do so, we carry out checks on these companies, put in place contracts to make sure our requirements are clear, and carry out periodic reviews. When we do use external companies, we remain responsible for the storing and processing of your personal data.

### **c. Credit/Debit card security**

If you use your debit or credit card to donate to us, purchase something or pay for an event, whether online or by Giving Envelope, we will process your information securely in accordance with the Payment Card Industry Data Standard. We may hold your bank account details if you have asked us to set up a standing order for you, which are stored securely and retained in line with legal requirements.

### **d. Where we store your personal information**

We use cloud-based systems to process data and therefore data may be processed outside of the European Economic Area (EEA). We adopt the Information Commissioners approved measures and therefore ensure that personal data is held in compliance with European data protection regulations. We take all reasonable steps to ensure that your data is stored and processed securely in accordance with this policy. By submitting your personal data you agree to this transfer, storing and processing of your information.

## **6. When we share your personal information**

Your personal data will be treated as strictly confidential and will only be shared with staff and members of the church in order to carry out a service or for purposes connected with the church. We will only share your data with third parties with your consent.

### **a. Legal duty**

We may need to pass on information if required by law or by a regulatory body. For example, a Gift Aid audit by the HMRC, or if asked for details by a law enforcement agency.

### **b. Our service providers**

We do not sell or pass any of your personal information to any other organisations and/or individuals without your express consent, with the following exception – by providing us with your details you are giving the church your express permission to transfer your data to our service providers including mailing houses, such as Iknowchurch and MailChimp, to enable fulfilment of the purpose for collection.

Where such details are shared we have confidentiality agreements in place that restrict the use of your information to the purpose for which it is provided and ensure it is stored securely and kept no longer than necessary. We may employ agents to carry out tasks on our behalf, such as processing donations. These agents are bound by contract to protect your data and we remain responsible for their actions.

We may provide third parties with general information about users of our site, but this information is both aggregate and anonymous. However, we may use IP address information to identify a user if we feel that there are or may be safety and/or security issues or to comply with legal requirements.

## **7. Cookies**

### **a. What are cookies?**

A cookie is a small amount of data that is sent to your browser and stored on your computer's hard drive. Our website makes use of cookies to collect information about our visitors.

### **b. How we use them on our website**

To enjoy our website to the full, we recommend that you leave cookies turned on. If you turn off cookies then you may not be able to enter parts of the site. The cookie data that we collect we may use to customise the content on our website and to help to understand visitor's current and future needs

### **c. Managing cookies**

Most browsers allow you to turn off the cookie function. To do this you can look at the help function on your browser.

### **d. Third party cookies**

We work with a number of third party suppliers who set cookies on our website to enable them to provide us with services. These are mainly used for reporting purposes so we can improve the

way we communicate. We use websites such as Youtube to embed videos and you may be sent cookies from these websites. We do not control the setting of these cookies, so we suggest you check the third party website for more information about their cookies and how to manage them.

We also use third party suppliers such as Google Analytics and these providers may use cookies. They may also use tracking pixels, which are commonly found in advertising to track the effectiveness of adverts. As some of these services may be based outside of the UK and the European Union, they may not fall under the jurisdiction of UK courts. If you are concerned about this you can change your cookie settings (see above) and can find more information about this here.

## **8. Children**

Families making use of the children's facilities during our services are required to provide personal data for their children. This data is provided with the consent of the parent or guardian and is securely held and stored as above. We require parental consent for any child under the age of 13.

## **9. Your choices and telling us when things change**

### **a. Preferences**

You can change your preferences on what you receive from us, or how we contact you, by mail or email, at any time. You can do so by:

Directly through Iknowchurch

Email us on: [office@churchcentral.org.uk](mailto:office@churchcentral.org.uk)

Write to us at: Data Security Manager, Churchcentral, Central House, 13 Ravenhurst Street, Birmingham, B12 0HD

### **b. Updating your details**

We do appreciate it if you keep your details up to date. You can do so in the same way as updating your preferences (above). We may use Post Office address search, postcode lists or other available sources to confirm data that you provide us with, where, for example, we are unsure of what you have completed on a form. We will not use these sources to create data that you have chosen not to provide, for example, if you have left a telephone number blank; nor will we automatically update changes of address, we will normally only update your address when you tell us it's changed.

### **c. Telling us to stop processing**

You have the right to ask us to erase your personal data, to ask us to restrict our processing or to object to our processing of your personal data. You can do so at any time by:

Directly through Iknowchurch

Email us on: [office@churchcentral.org.uk](mailto:office@churchcentral.org.uk).

Write to us at: Operations Manager, Churchcentral, Central House, 13 Ravenhurst Street, Birmingham, B12 0HD

### **10. Access to your information**

You have the right to request details of the information we hold about you. To make this request, please write to us at the details above. For more information about your rights under the Data Protection Act (DPA) and General Data Protection Regulation (GDPR) you can visit the website of the Information Commissioner's Office: [ico.org.uk](http://ico.org.uk)

### **11. Changes to this privacy notice**

This privacy notice was last updated in June 2018. We may amend this policy from time to time to take account of changes to our processes or changes to data protection or other legislation. If we make any significant changes to this policy we will show this clearly on our website or in our communications. By continuing to use our website you will be deemed to have accepted these changes.

### **12. Further processing**

If we wish to use your personal data for a new purpose, not covered by this Data Protection Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

### **13. Governing law**

The Privacy Notice is subject to English law. All claims or disputes (including non-contractual disputes or claims) arising out of or in connection with the use of the websites shall be subject to the non-exclusive jurisdiction of the courts of England and Wales.

If you have any queries please contact us at [office@churchcentral.org.uk](mailto:office@churchcentral.org.uk).