

Churchcentral Trust: Privacy Notice



Approved by Directors: October 2024

ISSUE	DATE	DESCRIPTION
Issue 1	2018	Document created
Issue 2	2021	Review. Update to security and financial security measures in place. Update to when we share your personal information to include an update to roles, due to changing structure of church.
Issue 3	2024	Review. Addition of CCTV and capturing images. Update to basis of processing information and data processors.

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 we collect from you or that you provide to us is kept safe. We will only use your personal details for the things you would expect a church to use them for.

This notice sets out how we process (use and store) your data, what data we hold, your individual rights and how you can interact with us about your data your personal information in accordance with the Data Protection Act 2018 (DPA) and the UK General Data Protection Regulation (UKGDPR).

2. Who we are

For the purposes of the act 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

a. Directly from you

Usually, we only collect your data when you give it to us directly, 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 financial donation; complete our consent forms for you or your children, or otherwise provide your personal details.

We may collect and process the following information about you to provide goods and services:

- Names, titles, and aliases, photographs.
- Contact information, including telephone numbers, residential addresses, and email addresses.
- Where there is a legitimate interest to facilitate our charitable aims and activities, or where you have provided them to us, we may process demographic information such as gender, age, date of birth, marital status, nationality, education and employment details, academic/professional qualifications, hobbies, family composition, and dependants.
- Your attendance at events and meetings run or hosted by us.
- Your participation in teams and ministries for service in the church.
- Information contained in emails or other correspondence from you and records of telephone calls or meetings with you.
- Where you give financially in support of Churchcentral or pay for church activities (event bookings etc.), financial identifiers such as bank account numbers, payment card numbers, payment/transaction identifiers.
- Information that you share with us for the purposes of pastoral care, encouragement, training, and prayer.
- Medical/ Special Educational Needs information where necessary to ensure that the care and hospitality that we provide for you is appropriate to your needs.
- 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.

We may collect and process the following information about you to comply with legal requirements:

- Identification documents
- Information contained in checks provided by the Disclosure and Barring Service.

b. From CCTV images or recordings

CCTV is in operation at Central House for security, so if you attend any events or meetings here your image may be captured on our CCTV. Additionally, we occasionally take recordings of events or photographs so your image may be captured in these. We put up notices to inform when images are being captured.

c. 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.

d. 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.

e. 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.

4. How we use your information

We use personal data to effectively manage the church, to provide you with the best service for your needs, and to keep you informed about Churchcentral.

Personal data that we collect may be used in a number of ways:

- 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, support, and teaching to our attendees.
- To enable and maintain appropriate safeguarding arrangements.
- To administer attendance/membership records.
- To raise funds and promote the interests of the charity.
- To manage our employees and volunteers.
- To help us identify where people can serve in the life of the church.
- To help us organise rotas, small groups and to communicate with you.
- To maintain our own accounts and records (including the processing of Gift Aid applications).
- To provide an interactive website.

Our processing also includes the use of CCTV systems for the prevention and prosecution of crime.

b. Basis of processing your data

Churchcentral relies on the following lawful bases for processing data:

- Where you have **provided us with your consent**. You are able to remove your consent at any time.
- Where we have a **legitimate interest** to enable our charitable and missional aims. For example, maintaining membership records, safeguarding our children, recording our financial donations and operating team rotas for the effective function of Sunday services.
- Where we have a **legal obligation**. Retaining safeguarding records and gift aid declarations are examples of this.
- Where we have a **contractual obligation**, or to provide a direct service to you. For example, if you buy tickets for a church event.
- As a religious organisation, we are permitted to process information about your religious beliefs to administer membership or contact details.

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 Protection Policy with a Data Retention Schedule 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 roles require such access, that suitable training is provided for these staff members and volunteers and security process are in place around the access to this data.

c. Financial security

If you use your card to donate to us, purchase something or pay for an event we will process your information securely in accordance with the Payment Card Industry Data Standard. We may hold your bank account details if this is necessary for making payments to you. Additional authentication security is in place on our finance platforms.

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 UK 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 necessary members of the church to carry out a service or for purposes connected with the church, for example ministry leaders, small group leaders and Sunday morning team leaders to enable them to provide pastoral care and support for you and arrange ministry and serving team rotas. We provide guidance around data protection and appropriate use of social media for members of the church who may hold this information as part of their role. However, we cannot be held responsible for individual members of the church sharing information on an informal basis. We will only share your data with third parties with your consent.

a. Legal duty

If legally required we may disclose your information to the police, regulatory bodies or legal advisors. For example, a Gift Aid audit by the HMRC, or if asked for details by a law enforcement agency.

b. Our data processors

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 details to our data processors:

iKnow: our membership database.

ExpensePlus: our finance software

Other organisations

Organisations we need to share information with for safeguarding reasons

Emergency services (where 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 facilities and activities that we offer for under 18s, whether on a Sunday morning or throughout the week, 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. When children reach the age of 13 we will ask for their consent for their data to be stored in line with UKGDPR.

9. Your rights

a. Changing your preferences

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

- Emailing us on: kate@churchcentral.org.uk
- Writing to us at: Data Protection Lead, Churchcentral, Central House, 13 Ravenhurst Street, Birmingham, B12 0HD
- Accessing your iKnow Church account and amending the permissions set up on your personal profile.

b. 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:

Emailing us on: kate@churchcentral.org.uk

Writing to us at: Data Protection Lead, Churchcentral, Central House, 13 Ravenhurst Street, Birmingham, B12 0HD

c. Accessing your information

You have the right to request details of the information we hold about you, as well as why we have that information, who has access to the information and where we obtained the information from. This request is often called a Subject Access Request. To make this request, please write to us at the details above. Further details about our Subject Access Request Procedures can be found in our Data Protection Policy.

d. Updating your details

We 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.

For more information about your rights under the DPA and UKGDPR you can visit the website of the Information Commissioner's Office: ico.org.uk.

10. Further processing

If we wish to use your personal data for a new purpose, not covered by this 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.

11. Our data protection contact

Our nominated representative for the purpose of the Act is Kate Watkins, our Operations Manager. For further information about how your personal information is used, how we store your information securely and your rights to access the information that we hold about you, please contact us at kate@churchcentral.org.uk.

12. How to complain

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance by emailing kate@churchcentral.org.uk.

You can also complain directly to the Information Commissioner's Office using the following details:

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>