

Privacy Policy for Hope Church Tonbridge

Hope Church Tonbridge values everyone who engages with us by whatever means, and we do all we can to protect your privacy and make sure the personal data you provide us with is kept safe.

We will ensure that the data is processed in accordance with the General Data Protection Regulation 2016/679 (the GDPR) and other legislation relating to personal data and rights such as the Human Rights Act 1998.

This policy explains how we collect data, how we use and store information and what it means for you.

1. WHAT INFORMATION WE COLLECT

We collect personal information directly from you when you, for example when you:

- complete a Keep In Touch card for newcomers
- submit a query via our contact forms on our website or via email
- register your children to access our Hope Church Tonbridge Kidz Church or Youth Work
- sign up for and attend an event, a course or a group
- complete a Giving Instruction (including Gift Aid)
- give online
- sign up to be a volunteer
- engage with our Safeguarding process
- or otherwise provide your personal details

We also store non-personally identifiable information when you visit our website such as IP addresses, details of pages visited and files downloaded.

2. WHAT PERSONAL INFORMATION DOES THE CHURCH PROCESS?

The personal information we hold varies greatly depending on what information you have submitted. For example, it may be as little as just your email address, or as much as given in a detailed application form or Gift-Aided donation. This could include:

- Names, titles and aliases
- Contact details such as telephone numbers, postal address and email addresses
- Photographs and videos
- Demographic information such as gender, age, date of birth, marital status, nationality, education/work histories, academic/professional qualifications, hobbies, family composition, and dependants
- Financial information such as your bank details, payment card numbers
- Whether you are a UK taxpayer
- The General Data Protection Regulation recognises some information as 'sensitive personal data'. The information we process is likely to constitute 'sensitive personal data' because, as a church, the fact that we process your information at all may be suggestive of your religious beliefs. Where you provide this information, we may also process other categories of sensitive personal data, including but not limited to, racial or ethnic origin, sex life, mental and physical health, details of injuries, medication/treatment received, data concerning sexual orientation, children's data and criminal records, fines and other similar judicial records.

3. WHAT DO WE DO WITH YOUR DATA?

We highly value the personal information you share with us. We will endeavour to keep your information up to date, to store and destroy it securely, to protect it from

loss, misuse, unauthorised access and disclosure and to ensure that appropriate technical measures are in place to protect it. We will not collect or retain excessive amounts of data.

We use your personal information for some or all of the following purposes:

- To enable us to meet all our legal and statutory obligations.
- To carry out comprehensive safeguarding procedures (including due diligence and complaints handling) in accordance with best safeguarding practice, with the aim of ensuring that all children and adults at risk are provided with safe environments.
- To provide pastoral and spiritual care and to perform services such as weddings and funerals.
- To connect you with the church community.
- To deliver the church's mission to our community and carry out any other voluntary or charitable activities for the benefit of the wider community.
- To run Sunday and midweek meetings, courses, groups and events.
- To maintain the church's accounts and records.
- To process a donation that you have made (including contacting you regarding Gift Aid information).
- To seek your views or comments.
- To notify you of changes to our meetings, events and role holders.
- To send you communications which you have requested and that may be of interest to you.
- To process a grant or application for a role.
- To manage our employees and volunteers.
- To operate the Hope Church Tonbridge website
- To contact you about any children or young people in your care and their involvement in our children's or youth work.

4. WHAT IS THE LEGAL BASIS FOR PROCESSING YOUR PERSONAL INFORMATION?

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 have 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 attendees, or former attendees (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.

5. SHARING YOUR PERSONAL INFORMATION

Your personal information will be treated as strictly confidential. It will only be shared with third parties where it is necessary for the performance of our tasks or where you first give us your prior consent. We may need to share your information with some or all of the following:

- Statutory organisations such as the police, the local authority and the health service.
- Our agents and contractors. For example, we may ask a commercial provider to send out newsletters on our behalf, or to maintain our database software.

We do not sell or pass any of your personal information to any 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 ChurchSuite, Constant Contact and MailChimp, to enable fulfilment for the purpose of 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.

6. HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION?

We will keep your information for only as long as we need it.

We will keep some records for an extended period of time if we are legally required to do so. For example, we will keep Gift Aid declarations and associated paperwork for up to six years after the calendar year to which they relate.

7. ACCESS TO YOUR INFORMATION AND CORRECTION

You have the following rights with respect to your personal Information. When exercising any of the rights listed below, in order to process your request, we may need to verify your identity for your security. In such cases we will need you to respond with proof of your identity before you can exercise these rights.

1. The right to access information we hold on you

- At any point you can contact us to request the information we hold on you as well as why we have that information, who has access to the information and where we obtained the information from. Once we have received your request we will respond within a month.
- There are no fees or charges for the first request but additional requests for the same data may be subject to an administrative fee.

2. The right to correct and update the information we hold on you

- If the information we hold on you is out of date, incomplete or incorrect, you can inform us, and your information will be updated accordingly.

3. The right to have your information erased

- If you feel that we should no longer be using your data or that we are illegally using your data, you can request that we erase the information we hold.
- When we receive your request, we will confirm whether the information has been deleted or the reason why it cannot be deleted (for example because we need it for our legitimate interests or regulatory purpose(s)).

4. The right to object to processing of your data

- You have the right to request that we stop processing your data. Upon receiving the request, we will contact you and let you know if we are able to comply or if we have legitimate ground to continue to process your data. Even after you exercise your right to object, we may continue to hold your information to comply with your other rights or defend legal claims.

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5. The right to data portability

- You have the right to request that we transfer some of your information to another controller. We will comply with your request, where it is feasible to do so, within one month of receiving your request.
6. The right to withdraw your consent to the processing at any time for any processing of data to which consent was sought
 - You can withdraw your consent easily by telephone, email, or by post (see Contact details below).
 7. The right to object to the processing of personal data where applicable.
 8. The right to lodge a complaint with the Information Commissioner's Office (see Contact details below).

You can change your preferences on what you receive from us, or how we contact you, by mail or email, at any time. See Contact details below.

We do appreciate it if you keep your details up to date. You can do this 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 has changed.

8. TRANSFER OF INFORMATION ABROAD

Any electronic personal information transferred to countries or territories outside the EU will only be placed on systems complying with measures giving equivalent protection of personal rights either through international agreements or contracts approved by the European Union. Our website is also accessible from overseas so on occasion some personal data may be accessed from overseas.

9. FURTHER PROCESSING

If we wish to use your personal information for a new purpose, not covered by this policy, then we will provide you with a new privacy 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.

10. OTHER WEBSITES

Our website contains links to other websites. This privacy policy only applies to this website so when you link to other websites you should read their own privacy policies.

11. CHANGES TO OUR PRIVACY POLICY

We keep our privacy policy under regular review and the latest version is always available from our website (in the footer area of each page) or by contacting us at the email or address below.

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. CONTACT DETAILS

Please contact us if you have any questions about our privacy policy or information we hold about you:

Hope Church Tonbridge

93 Whistler Road

Tonbridge

Kent TN104RG

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

ico.org.uk/global/contact-us/email/

0303 123 1113

Last updated 29th June 2018