

Faith Life Church Cambridge Privacy Policy

Approved by Trustees	October 2022
Review Cycle	Every Year (next review date October 2023)

1. INTRODUCTION

This Privacy Policy describes how Faith Life Church Cambridge, ("**Faith Life**") collect, use, disclose, transfer, store, retain or otherwise process your information, whether provided through an approved third-party system or acquired directly by any other means and will be dealt with in accordance with the Law.

2. DEFINITIONS

Whenever "We", "Our" or "Us" is used in this Policy it is referring to Faith Life Church Cambridge and your relationship with us as you use our services.

The ("**Data Controller**") is Faith Life Church Cambridge as defined in UK GDPR law as the entity that determines the purpose for which personal data is collected and processed.

"Personal Data" is any information about a living individual, which allows them to be identified, such as a name, email or photograph and can identify them alone or in conjunction with other information.

3. DATA PROTECTION LAW

This policy outlines how we comply with laws and regulations applicable in the UK including (i) the UK Data Protection Act 2018; (ii) UK General Data Protection Regulation ("**UK GDPR**") together ("**the Law**").

4. FAITH LIFE, THEREFORE, SETS OUT THAT:

All Personal Data acquired from or relating to such persons accessing services provided by Faith Life for any purpose will be dealt with in accordance with this Policy, our internal data handling policies, and the Law.

Such information will be kept confidential and only be provided to third parties, who assist us and provide goods or services or when required to do so by law.

Faith Life takes your privacy very seriously and this Policy has been adopted as it recognises the right of people to keep their personal information private.

By providing Personal Data to Faith Life, you agree to allow us to contact you, including by mail, email, phone, or SMS text message, in connection with our charitable purposes based on the consent you have given.

We will adhere to the Principles of Data Protection as detailed in UK GDPR. Your information will be:

- a) Processed lawfully, fairly and in a transparent manner.
- b) Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- c) Data related to anyone under the age of 18 is held with the consent of a parent or guardian
- d) Adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed.
- e) Accurate and, where necessary, kept up to date.
- f) Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.

g) Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage using appropriate technical or organisational measures.

5. HOW PERSONAL INFORMATION IS COLLECTED

Personal Data is collected each time you are in contact with us, for example, when you:

- a) Visit the website (see the <u>Cookies Policy</u>).
- b) Donate to Faith Life.
- c) Register for a Faith Life event.
- d) Apply for a job or volunteer at Faith Life.
- e) Provide your contact details, in writing or orally, to the Faith Life staff or volunteers.
- f) Provide your contact details through an online form.
- g) Providing consent as a parent or guardian information required for your child to partake in Faith Life Kids and Youth activities.
- h) Purchase goods or services from Faith Life, through the website, or directly and when you provide credit or debit card details.
- i) Participate in other Faith Life activities e.g., life groups.
- j) Contact us by means such as email, text, letter, or telephone.
- k) Have face-to-face meetings with staff and volunteers.
- l) Access social media platforms such as Facebook, YouTube, WhatsApp, Twitter, and Instagram.

6. TYPES OF INFORMATION COLLECTED

Personal

The types of personal information collected by us include:

- a) Personal details such as your title, name, and date of birth.
- b) Contact details such as a postal address, postcode, email, mobile and telephone numbers.
- c) When relevant, demographic information such as marital status, nationality, education, employment/qualifications, and family details.
- d) Financial information such as donation history and your bank details.
- e) Whether you are a taxpayer in the UK.
- f) Spouse and family details when you jointly volunteer, register for events, and/or register your children for any reason at Faith Life.
- g) With the consent of a parent or guardian, names, date of birth, gender, and photo permission of under 18s involved in our Kids and Youth groups
- h) Non-financial information such as passports, driving licences and financial information such as salary records, tax codes and expense claims.
- i) Employee and volunteer data such as qualifications and experience.
- j) Records of your contact with us.
- k) Photographs provided by you or taken at Faith Life services or events.
- l) Visits to the website to enable Faith Life to improve its effectiveness and better promote church services and events.

Sensitive/Special Category Personal Information

We may collect and store sensitive personal information (Special Category Information under UK GDPR) such as:

- a) Health information provided during pastoral meetings.
- b) Health information provided with the consent of a parent or guardian relating to any medical conditions or allergies of under 18s, that we need to be aware of to run our Kids and Youth activities.
- c) Health information to assist attendance at Faith Life services and events.
- d) Religious information (attendance at Faith Life events/activities, personal faith decisions, baptism).
- e) Religious affiliation when you attend and register for Faith Life Church events and conferences.
- f) Prayer requests.

7. HOW WE USE YOUR INFORMATION

We collect information about you for a variety of uses based on different reasons. For example, some of the information is disclosed to register for activities or events, sometimes we are required by law and regulations to collect and process information about you, and at other times we consider it is in our legitimate charitable interest to collect and process information.

Your personal information will be dealt with in accordance with the Law. It is never sold, nor given away. It is only shared with others where you have given consent or where it is permitted or required either contractually or legally.

We will not use your personal information for any other purpose without first seeking your consent unless authorised or required by law.

Generally, uses of your personal information based on our legitimate charitable interests and on your consent may include:

- a) Keeping you informed as to Faith Life Church services, activities, events, resources, and conferences.
- b) To create rotas and to keep you informed of when you are serving.
- c) To promote the interests of Faith Life, its Christian mission and its charitable objects.
- d) To manage employees and volunteers.
- e) To fundraise and process donations and related statutory rights and obligations.
- f) To establish and maintain your involvement with us, events you have attended, what areas and activities of Faith Life you have supported, record and acknowledge any donation, to provide the products or services you have requested.
- g) To answer an inquiry or request for further information or complaint about us, our services, activities, and events.
- h) To register you for events, and conferences and provide the services requested.
- i) To provide pastoral support to you, including acting on prayer requests.

8. LEGAL BASIS FOR USING YOUR PERSONAL INFORMATION

We will only process your personal information where we have a legal basis to do so. The legal basis will depend on the reason or reasons we collected and need to use your information. Under the Law in almost all cases the legal basis will be:

- a) Because it is in our legitimate interest as registered charitable and Christian religious entities to use your personal information to operate and improve our services.
- b) To fulfil any contractual relationship, we have with you in relation to the provision of products or services.
- c) Because you have consented to Faith Life using your information for a particular purpose.
- d) Because we need to use your personal information to comply with a legal obligation, such as the protection and welfare of individuals.
- e) To protect the vital interests of you or another person, for example, in pastoral situations.
- f) To process sensitive/special category personal data that is relevant to us as a not-forprofit religious organisation.
- g) Where you have given consent for us to contact you by email, post, phone, or SMS, to send you information and marketing communications.

9. DATA STORAGE AND WHO SEES YOUR INFORMATION

Information you provide electronically, including through this website, may be held on computers in Faith Life Church offices and on servers in the UK, EEA, and USA.

Information you provide in paper forms, such as consents, letters or recorded in meetings with staff or volunteers, may be transferred to secure virtual systems or stored in secure physical filing systems.

Subject to compliance with our data management policies and procedures, and in compliance with the above Data Protection Principles, information may be accessed, used, and stored:

- a) On computers belonging to Faith Life and providers servers based in the EEA, UK, and the USA.
- b) By a limited number of staff or key volunteers under a duty of confidentiality who are involved in the development, maintenance, and operation of the services listed below.

Third-party service providers may process information, fulfil, and deliver orders, process donations and credit card payments, and provide support services on our behalf. Where such details are shared, agreements and policies made on behalf of the service provider are in place to restrict the use of your information to the purpose for which it is provided and ensure it is stored securely and in accordance with applicable data protection and privacy laws.

Our five main providers are:

- a) Church Suite LTD hosted in the UK, which provides communication services and CRM services.
- b) The Rocket Science Group hosted in the USA, DBA: MailChimp, provides email communication services.
- c) Endis Ltd hosted in the UK, DBA Hubb Church provides website services, card payment systems and media storage and distribution.
- d) Stripe Inc provides card payment processing for Endis Ltd and intern Faith Life and is a certified PCI Service Provider Level 1.
- e) Google LLC, hosted in the US, UK and EEA, provide communication services.

We do not sell or pass any of your personal information to any other organisation and/or individuals without your express consent unless required by law.

10. FINANCIAL RECORDS AND CARD DETAILS

All credit/debit card donations made online, are made securely through the third-party service provider and payment gateway, Stripe Inc, which are certified service provider Level 1. Although card details are inputted on our website hosted by Hubb Church, neither ourselves (Faith Life) nor Hub Church, see nor process card numbers.

We do not store unredacted financial details (credit or debit card numbers) in paper form or those obtained through online transactions, nor do we pass any information to third parties, except where we are legally required to do so, to assist in fraud reduction.

Faith Life will never take financial information in paper form, over email or over the phone. If you are ever unsure or are asked to provide financial information in a way that is not covered in this policy, please contact the Faith Life office: <u>office@faithlifechurch.org.uk</u>

11. SPECIFIC INFORMATION RELATED TO DATA HELD FOR UNDER 18S

If you are a parent or guardian of a minor, we will only process the data of the minor when you have freely given a specific, informed, and clear agreement (usually through a consent form). You can withdraw this consent at any time, but we may need to hold certain data for legal and safeguarding reasons (please refer to section 13 "Your Rights"). We also cannot allow children under 18 to partake in children and youth activities if you do not consent us to hold certain information on your child. Where possible, we will also ensure that consent documentation is appropriate for the minor, so that they can also understand our requirements for consent. Whenever you give consent, we will keep a record of when and how this was given.

12. HOW LONG WE RETAIN YOUR INFORMATION

We will only keep your personal information for as long as it is required and in accordance with the Law and other legal requirements.

If you have indicated that you no longer wish to hear from us, we will keep the minimum information necessary to ensure that no future contact is made.

However, even after you modify your communication preferences, we may retain copies of information about you for a period of time that is consistent with applicable law, the applicable statute of limitations or as we believe is reasonably necessary to comply with applicable law, regulations, or legal process.

Where we hold Sensitive Category Personal Information, unless we have evidence of your regular contact with us or we are required by law to retain, the sensitive information will be deleted after a period of two (2) years.

13. YOUR RIGHTS

Personal Information

Where you have provided your consent to us processing your personal data, you may withdraw this consent at any time. In addition, the Law gives you the right, under certain circumstances:

- a) To request in writing and securely obtain copies of the personal information we hold about you.
- b) To correct or update your personal information held by us.
- c) To request us to stop using your personal information for marketing purposes or for any other purpose where there is no legal requirement for continued processing.
- d) To object to profiling activities based on our legitimate interest.
- e) To request to have all personal data deleted. To exercise any of these rights please contact office@faithlifechurch.org.uk.

Please tell Faith Life as soon as any of your contact details change so that records can be kept up to date. We will take reasonable steps to correct any of your information, which is inaccurate, incomplete, or out of date.

A request to access, amend or delete your personal information may be refused in certain circumstances. If refused, you will be provided with a reason for the decision and, in the case of amendment, will note with your personal information that its accuracy is disputed.

14. REPORTING CONCERNS

Please contact Faith Life if you wish to raise a concern about the handling of your personal information through this website or information provided by other means.

You also have the right to lodge a complaint with the Data Protection Authority Office (see contact details below) about how your data is managed.

15. CHANGES TO THIS PRIVACY NOTICE

Faith Life may amend this Policy from time to time to reflect changes in best practice, security, and control and to ensure compliance with any changes or amendments to the Law or other applicable legislation in the United Kingdom. Any amended version will be available on the website. We suggest you visit regularly to keep up to date with any changes.

16. CONTACT

Faith Life Church Cambridge Email: office@faithlifechurch.org.uk

Information Commissioners Office (UK)

https://ico.org.uk/concerns/ Helpline: 0303 123 1113