

## **PRIVACY POLICY**

### **Your Privacy**

www.edencc.co.uk (“the Services”) is designed to help us administer our church and provide all elements of pastoral care to our members and the community. Our members may be provided with access to a user account, which they can use to provide us with information (including personal information), update preferences and access options to allow the booking of events and recording attendance. The Services should bring benefits to everyone as we can stay in touch with you much more easily and you can provide us with information in a quick and efficient way.

In addition to www.edencc.co.uk, we may also collect information from you in person or on paper forms or online forms within other systems. We have also included information about other forms of processing that we may carry out.

### **What is the purpose of this Privacy Policy?**

Eden Christian Centre is a “data controller” which means we have to tell you certain information when processing your personal information. We may input personal information into our database or may ask you to do so yourself. We may collect information from you in person or we may ask you to fill in paper forms or input information into other systems that the church uses.

If you have any queries about this Privacy Policy or how we use your personal information, please contact Georgina Jones who can be contacted at Eden Christian Centre, Connaught Road, Ilford IG1 1RN or email [info@edencc.co.uk](mailto:info@edencc.co.uk)

This Privacy Policy relates to your use of the Services and tells you:

- What personal information we collect about you when you use the Services
- How we collect your personal information in the Services
- How we use your personal information
- Who we may share your personal information with
- Any transfer of personal information outside of the EEA
- How long we keep your personal information
- What we do to protect your personal information
- What choices you have in relation to your personal information
- We last updated this Privacy Policy on [24th May 2018]

### **Personal Information we process about you**

What information we process about you

We may collect the following information about you:

- your name and address
- your mobile phone number
- your email address
- whether or not you are ordained or in holy orders
- any ecclesiastical permissions you hold
- your marital status
- your age and gender
- information about your family
- your education and employment
- your role(s) within the church (if appropriate)
- any membership of a PCC or status as a representative for the church
- attendance at meetings, events and training
- to carry out a DBS check
- the result of a DBS check
- information about your use of the Services (e.g. when you have logged in, what pages you visited)
- information we collect and record as part of pastoral care (this will include anything you tell us unless you tell us not to record it)
- payment details when booking events

- donations to the church
- Any information you provide to us
- Any teams or groups you are involved with
- When you are unavailable for serving on rota
- Dates and times that you are on a rota

### **Sensitive Personal Information**

We may also collect, store and use the following “special categories” of sensitive personal information (if you give us this information)

- Information about your health, including any mental or physical conditions that you notify us about
- Your religious beliefs
- Your racial origin
- Your sexual orientation
- Any criminal record

### **Personal Information you give us**

We may collect personal information from you when you attend church and speak to us in person. You may also fill in one of our paper forms, a form available in a different electronic system. We collect personal information from you when you or we set up a user account in a database. If we set up an account on your behalf, then we will input personal information from you that we collected from you in person, on paper forms and from contact forms on our website. We will also collect information from you when you update your user account on database.

### **Personal Information we collect automatically**

When you use the Services, we may collect certain information automatically such as:

IP address (the name your electronic device uses to identify itself to us)

Your activity in the Services including times and dates of visits

Information on your location

other websites you may have visited

### **Cookies**

We use cookies to collect information automatically. A cookie is a small file of data which our website places on your computer’s hard drive. The cookies give us information such as details of your visits to our website and information about other websites that you visit.

Cookies allow websites to respond to you as an individual and let us tailor our website to your needs, likes and dislikes by gathering and remembering information about you. We use cookies to help us to provide you with a better website.

### **Cookies that we use**

Google Analytics

### **How to delete and control cookies**

Most computers automatically accept cookies but you can change your settings so that you will not receive cookies and you can also delete existing cookies from your computer.

If you do change your settings, you may find that some parts of our website will not function properly. If you do not adjust your settings, you will accept cookies provided by this website.

To find out how to delete cookies or adjust their settings please visit <http://www.allaboutcookies.org/>.

### **How we use your Personal Information**

## **Our legal basis for using your information**

The law only allows us to use your personal information in certain limited circumstances. We have listed these below and what information they allow us to process.

### **1.) Where it is necessary for our legitimate interests**

The GDPR specifically states that a church may use legitimate interests to process personal information relating to its members to administer your membership to the church. We consider that this is the most appropriate condition for us to administer your membership of our church as you would reasonably expect that we would have to process your personal information in order to provide you with membership of our church and so you can take full advantage of all our services. We have put safeguards into place to ensure that your personal information is protected and that your fundamental rights and freedoms are not overridden.

Examples of how we may use your information for administration purposes:

- to set up your user account on our software
- so that we can keep a record of your attendance at church, bible classes and at other events and meetings
- to provide you with pastoral care and other support that you have requested, and we believe would be helpful to you
- to organise volunteers and put together rotas

We may also use legitimate interests to send out our marketing materials but only where such materials relate directly to the church and you have not told us not to send you such information]

### **2.) Where you have consented to us using your personal information**

Examples of how we may use your information with consent

- We may ask for your consent to send marketing communications out to you, including information about our events and other marketing materials]
- We may also ask for consent where you have given us information as part of our pastoral care and asked us to use it for a certain purpose.

### **3.) Where we need to perform the contract we have entered into with you**

Examples of how we may use your information in order to comply with a contract that we have entered into with you:

- to buy tickets for events
- to administer the Services (such as troubleshooting, data analysis, research)
- to tell you about changes to our website, software or Services that will affect your use of our database
- to help us (or the software developers) improve the Services

### **4.) Where we need to comply with a legal obligation**

Examples of how we may use your information to fulfil a legal obligation

- keeping records for gift aid purposes
- to prevent and detect fraud
- to protect children and vulnerable adults
- to get your feedback on the Services

## **HOW WE USE SENSITIVE PERSONAL INFORMATION**

“Special categories” of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

1. In limited circumstances, with your explicit consent recorded in writing (e.g. where you tell us information in order to obtain support and pastoral care from us – for example this could relate to physical or mental health).
2. Where we need to carry out our legal obligations (e.g. ensure DBS checking is done where appropriate).
3. Where it is needed in the public interest and in line with our data protection policy.

4. Where it is needed in connection with our children and vulnerable adults protection policy. Less commonly, we may process this type of information where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

### **What this means in practice**

We may use your sensitive personal information in the following ways:

- your mental or physical health, racial origin, sexual orientation or criminal record in order to provide you with support and pastoral care. We may also use this information to help you access support and benefits if appropriate and requested by you
- your religious beliefs in order to administer your membership of our church
- your DBS check (which may contain information relating to criminal offences or presence on a register) to decide your suitability for roles in the church

In all cases where we require consent, we will seek your written consent or record your consent in writing to allow us to process certain sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

### **Information about Children**

Whilst information relating to children is not considered to be special category information, it is information that is given specific protection. Where the child is under the age of 13 we will always ask for the consent of parents before allowing the child to set up an account on our database and ensure that the parent is able to access and administer the account.

Where a child is 13 or over then we will permit the child to have their own user account, but we may (if we believe it to be appropriate in the circumstances) inform the parents. We will tell the child at the time of signing up that we may inform their parents and we will only do this where it is appropriate and lawful to do so.

### **Sharing your Personal Information**

#### **Other third parties**

We may share your information with certain third parties including:

- With other members of our church so that they can provide you with support and pray for you
- Other churches – if you request us to pass on your information either to them or from them (if you move)
- Support services and benefits providers (e.g. local authorities, your doctor)
- Our suppliers for the performance of any contract we enter into with them or you
- Our software providers who need to see your information in order to keep our website up and running
- Analytics and search engine providers who analyse information about your use of our website and help us to tailor the product and offers that we offer to you and other users

We work with the following organisations:

- MailChimp (for sending emails)
- HMRC (for claiming of Gift Aid)
- Global Payments (for processing of Card Donations)

### **Legal Requirements and Law Enforcement**

We may also disclose your personal information to third parties:

- If we are required by law, or in order to enforce or apply our terms of use. This includes exchanging information with other organisations such as law enforcement agencies.

### **Third Party Privacy Policies**

The Services may contain links to websites owned by other organisations. If you follow links to other websites, these websites they will have their own privacy policies. We suggest that you check the policies of any other websites before giving them your personal information as we cannot accept responsibility for any other website.

### **Keeping your Personal Information**

## How we store your personal information

The security of your personal information is important to us.

We use appropriate technical and organisational measures to safeguard personal information and encryption technology where appropriate to enhance privacy and help prevent information security breaches.

Any personal information that we provide to you will be held within the EEA.

All third parties who provide services to us or our software provider are required to sign a contract requiring them to have appropriate technical, administrative and physical procedures in place to ensure that your information is protected against loss or misuse.

All information you provide to us is stored on our secure servers or on secure servers operated by a third party. Information on our third-party providers can be found above.

## Retention of information

We only hold your personal information for as long as necessary for the purposes for which we collected your information.

We have set these timescales in accordance with any applicable legislation and where none exists then we will keep your information for the duration of any contract that you have entered into with us and then for a period of 7 years after which time it will be deleted.

## Emails

If you chose to send us information via email, we cannot guarantee the security of this information until it is delivered to us.

Your rights

## Access to information

You have the right to access information that we hold about you. If you wish to receive a copy of the information that we hold, please contact at [info@edence.co.uk](mailto:info@edence.co.uk) or write to us at Eden Christian Centre, Connaught Road, Ilford IG1 1RN.

## Changing or deleting your information

You can ask us at any time to change, amend or delete the information that we hold about you or ask us not to contact you with any further marketing information. You can also ask us to restrict the information that we process about you.

You can request that we change, amend, delete your information or restrict our processing by emailing us at [info@edence.co.uk](mailto:info@edence.co.uk)

Right to object or restrict

You can ask us not to process the information we hold about you (where applicable) particularly where there is a dispute in relation to the accuracy or processing of your personal data. To request a restriction is placed on further processing email us at [info@edence.co.uk](mailto:info@edence.co.uk)

## Right to withdraw your consent

You have the right to withdraw your consent to the processing of your information at any time. You can withdraw your consent by emailing us at [info@edence.co.uk](mailto:info@edence.co.uk)

## Transferring Personal Information

You have the right to request that your personal information is transferred by us to another organisation (this is called “data portability”). Please contact us at [info@edence.co.uk](mailto:info@edence.co.uk) with the details of what you would like us to do and we will try our best to comply with your request. It may not be technically feasible, but we will work with you to try and find a solution.

## Right to prevent Automated decision making

You have a right to ask us to stop any automated decision making. We do not intentionally carry out such activities, but if you do have any questions or concerns we would be happy to discuss them with you and you can contact us at [info@edence.co.uk](mailto:info@edence.co.uk)

## Complaints

If you make a request to us under this Privacy Policy and you are unhappy with the response, you can ask for the request to be reviewed under our internal complaints procedure. Our internal complaints procedure allows your request to be reviewed by Bryon Jones, Senior Pastor, who will do their best to try and resolve the issue.

If you have been through the internal complaints procedure and are still not happy with the result, then you have the right to complain to the Information Commissioner's Office. They can be contacted as follows:

Website: [www.ico.org.uk](http://www.ico.org.uk)

Telephone: 03031231113

Address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

### **Changes to our Privacy Policy**

We review our Privacy Policy on a frequent basis to check that it accurately reflects how we deal with your information and may amend it if necessary. You should check this page regularly to see the most up to date information.

### **How to Contact us**

We welcome questions, comments and requests regarding this Privacy Policy which can be sent to [info@edence.co.uk](mailto:info@edence.co.uk)