

Christian Life Ministries

Data Protection & Privacy Policy February 2018

Christian Life Ministries (“CLM”) uses personal data for general church administration and communication purposes. CLM recognises the importance of the correct and lawful treatment of personal data. All personal data, whether it is held on paper, on computer or other media, will be subject to the appropriate legal safeguards as specified in the General Data Protection Regulation (GDPR) 2017.

GDPR specifies the legal conditions that must be satisfied in relation to obtaining, handling, processing, transportation and storage of personal data. Employees and any others who obtain, handle, process, transport and store personal data for CLM must adhere to these principles.

1. Be processed fairly and lawfully and shall not be processed unless certain conditions are met.
2. Be obtained for a specified and lawful purpose and shall not be processed in any manner incompatible with that purpose.
3. Be adequate, relevant and not excessive for those purposes.
4. Be accurate and where necessary, kept up to date.
5. Not be kept for longer than is necessary for that purpose.
6. Be processed in accordance with the data subject’s rights.
7. Be kept secure from unauthorised or unlawful processing and protected against accidental loss, destruction or damage by using the appropriate technical and organisational measures.
8. Not be transferred to a country or territory outside the European Economic Area, unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

Your personal data – what is it?

“Personal data” is any information about a living individual which allows them to be identified from that data (for example a name, photographs, videos, email address, or address). Identification can be by the information alone or in conjunction with any other information. The processing of personal data is governed by *[the Data Protection Bill/Act 2017 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)]*.

Who are we?

This Privacy Notice is provided to you by Christian Life Ministries (“CLM”) which is the Data Controller for your data. The administration and oversight of personal data is facilitated by the Database Administrators.

How do we collect information from you?

CLM only collects and records data that you provide to us, unless we are required to seek external verification for legal reasons (for example a DBS check if you are applying to work with children and young people).

In what ways do we collect and store data:

- By you entering your details into the Church Database at our Welcome Area, or by completing a ‘CLM Registration Form’. Only this information is entered into CLM’s database.
- By joining a church serving team (rota), ministry (for example a Life Group, Treasure Kids).
- By signing up to a CLM event or course.
- By making a financial donation to the church, typically through the Gift Aid scheme.

What type of information is collected from you?

CLM will process some or all of the following information where provided by you:

- Names, titles, and aliases, photographs, videos;
- Contact details such as telephone numbers, addresses, and email addresses;
- Where they are relevant to our charitable objectives, or where you provide them to us, we may process demographic information such as gender, age, date of birth, marital status, nationality, education/work histories, academic/professional qualifications, hobbies, family composition, and dependants;
- Where you make donations or pay for activities such as use of church facilities, financial identifiers such as bank account numbers, payment card numbers, payment/transaction identifiers, policy numbers, and claim numbers;
- Where you attend a course, training event, life group or other church-based event or ministry, we may capture the fact you attended to help us with our planning and coordination of such activities.
- If you visit our web site or use our online church database, we may capture your IP address (the unique address of the device you are using) for statistical and security purposes.
- If you make a donation online or purchase a product from us, your card information is not held by us, it is collected by our third-party payment processor, who specialise in the secure online capture and processing of credit/debit card transactions. Where donations are made using the envelope system, the credit card portion of the envelope is destroyed immediately after processing.
- The data we process is likely to constitute sensitive personal data because, as a church, the fact that we process your data at all may be suggestive of your religious beliefs. Where you provide this information, we may also process other categories of sensitive personal data, for example, where it pertains to Safeguarding or one-to-one pastoral conversations.

How is your information used?

CLM will comply with its legal obligations to keep personal data up to date; to store and destroy it securely; to not collect or retain excessive amounts of data; to keep personal data secure, and to protect personal data from loss, misuse, unauthorised access and disclosure and to ensure that appropriate technical measures are in place to protect personal data.

CLM may use your personal data for some or all of the following purposes:

- To enable us to meet all legal and statutory obligations;
- To carry out comprehensive safeguarding procedures (including due diligence and complaints handling) in accordance with best safeguarding practice from time to time with the aim of ensuring that all children and adults-at-risk are provided with safe environments;
- To minister to you and provide you with pastoral and spiritual care (such as visiting you when you are gravely ill or bereaved) and to organise and perform ecclesiastical services for you, such as baptisms, weddings and funerals;
- To deliver the Church's mission to our community, and to carry out any other voluntary or charitable activities for the benefit of the public as provided for in the constitution and statutory framework of the church;
- To administer the contact database;
- To fundraise and promote the interests of the Church and charity;
- To maintain our own accounts and records;
- To process a donation that you have made (including Gift Aid information);
- To seek your views or comments;
- To notify you of changes to our services, events and rota's;
- To send you communications which you have requested and that may be of interest to you. These may include information about events, campaigns, appeals, other fundraising activities;
- To process a grant or application for a role;
- To enable us to provide a voluntary service for the benefit of the public in a geographical area as specified in our constitution;
- Our processing also includes the use of CCTV systems for the prevention and prosecution of crime.

Who has access to your information?

- CLM will not sell or rent your information to third parties.
- CLM will not share your information with third parties for marketing purposes.

Third Party Service Providers working on our behalf: We may pass your information to our third-party service providers, agents subcontractors and other associated organisations for the purposes of completing tasks, and providing services to you on our behalf (for example to process donations and send you information relating to CLM or ministries it supports). CLM's church database is also hosted by a specialist church database provider.

When we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for any other purpose.

CLM will never release your information to third parties for commercial purposes (e.g. for marketing), unless you have requested us to do so, or we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime.

When you are using our secure online donation pages, your donation is processed by a third-party payment processor, who specialises in the secure online capture and processing of credit/debit card transactions. If you have any questions regarding secure transactions, please contact us.

On occasion, CLM works with other churches and charities to undertake joint events or activities. Where you have expressly volunteered to support such an event or activity, CLM may release limited personal information (for example your name and a method of contact) to that organisation (but never outside of the European Economic Area "EEA"), and only such specific information which is necessary for the safe and efficient running of the event or activity.

How long do we keep your personal data?

Other than where there is a legal or regulatory requirement, CLM will not retain personal information or records beyond that which is necessary. In practice:

- CLM will delete personal information/ records if asked to do so by an individual (your right to be forgotten);
- Maintain regular monitoring of databases and where individuals are known to have left the church, seek confirmation of such and archive and then remove such individuals from the database;
- Approximately every two years, undertake deep cleanse of the database.

CLM will keep some records permanently if we are legally required to do so.

CLM may keep some other records for an extended period of time. For example, it is current best practice to keep financial records for a minimum period of six years to support HMRC audits. In general, CLM will endeavour to keep data only for as long as we need it. This means that we may delete it when it is no longer needed.

Access to your information and corrections

You have the right to request a copy of the information that we hold about you.

If you would like a copy of some or all of your personal information, please email or write to The CLM Data Controller at the email address listed at the end of this documents under 'Contact Details'. We may make a small charge for this service. We want to make sure that your personal information is accurate and up to date. You may ask us to correct or remove information you think is inaccurate.

For information about CLM's policy on 'Access your information and corrections', please refer to the following document www.clmchurch.co.uk/data-protection

You can also view and update your contact information and mailing preferences through CLM's church app, MyChurchSuite.

CLM's Database

CLM's database is accessed through the cloud and therefore, can be accessed through any computer or smart device with internet access. The software uses latest encryption technologies to help ensure the security of data. The server for the database is situated in the UK (and no data is transferred overseas) and hosted by Churchsuite, a major UK supplier of church management and administration software.

1. Access to the database is strictly controlled through the use of name specific passwords, which are selected by the individual and access and activity on the database is logged (audit trail) and can be viewed by the Database Controller only.
2. Access is only allowed to those individuals who have agreed to adhere to CLM's Data Protection policy.
3. Those authorised to use the database only have access to their specific area of use within the database. This is controlled by the Data Controller and other specified administrators. These are the only people who can access and set these security parameters.
4. People who will have secure and authorised access to the database include some CLM Staff, data in-putters, Ministry Heads and Team Leaders, Life Group and Cluster Leaders and CLM Trustees and Elders.

Cookies

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of the website and to compile statistical reports on website activity.

For further information visit www.aboutcookies.org or www.allaboutcookies.org.

You can set your browser not to accept cookies and the above websites tell you how to remove cookies from your browser. However, in a few cases, some of our website features may not function as a result.

What is the legal basis for processing your personal data?

Most of our data is processed because it is necessary for our legitimate interests, or the legitimate interests of a third party. An example of this would be our safeguarding work to protect children and adults at risk. We will always take into account your interests, rights and freedoms.

Some of our processing is necessary for compliance with a legal obligation. We may also process data if it is necessary for the performance of a contract with you, or to take steps to enter into a contract. An example of this would be processing your data in connection with the hire of church facilities.

Religious organisations are also permitted (GDPR Article 9 Para 2(d)¹) to process information about your religious beliefs to administer membership or contact details.

Where your information is used other than in accordance with one of these legal bases, we will first obtain your consent to that use.

¹ <http://www.privacy-regulation.eu/en/article-9-processing-of-special-categories-of-personal-data-GDPR.htm>

Transfer of Data Abroad

Any electronic personal data 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 (for example in a newsletter) may be accessed from overseas.

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 also seek your prior consent before processing.

Changes to our privacy policy

We keep our privacy policy under regular review and we will place any updates on this www.clmchurch.co.uk/data-protection.

This privacy policy was last updated on **08th February 2018**.

Contact Details

Please contact us if you have any questions about this Privacy Notice or the information we hold about you or to exercise all relevant rights, queries or complaints.

The Data Controller

Email: datacontroller@clmchurch.co.uk

You can contact the Information Commissioners Office on:

☎ 0303 123 1113

✉ <https://ico.org.uk/global/contact-us/email/> or at the

📄 Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

Further Information

The General Data Protection Regulation (GDPR)

🔗 eugdpr.org/

🔗 ico.org.uk/for-the-public/

Access to your information and corrections

You have the following rights with respect to your personal data:

When exercising any of the rights listed below, in order to process your request, CLM 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 one 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 data we hold on you is out of date, incomplete or incorrect, you can inform us, and your data will be updated.
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 data we hold.
 - When we receive your request, we will confirm whether the data 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 grounds to continue to process your data. Even after you exercise your right to object, we may continue to hold your data to comply with your other rights or to bring or defend legal claims.
5. The right to data portability
 - You have the right to request that we transfer some of your data 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.