



# Privacy Policy

How we respect privacy when we deal with personal information collected by our organisation

## Definitions

|                            |  |
|----------------------------|--|
| <b>Charity</b>             | means Churches in Croxley Green CIO, a registered charity, number 1179287 (“we”, “us” and “our”). We are a Data Controller (see below) for the purposes of the GDPR (see below).                                       |
| <b>Data Controller</b>     | means us, as we determine the purposes, conditions and means of the processing of personal data.   |
| <b>Data Processor</b>      | means an entity that processes data on behalf of the Data Controller   |
| <b>GDPR</b>                | means the General Data Protection Regulation 2016/279. This, together with the Data Protection Act 2018, forms part of the data protection regime in the UK. The GDPR applies to Data Controllers and Data Processors. |
| <b>Personal data</b>       | means any information related to a natural person that can be used directly or indirectly to identify the person (referred to from here as an individual)  |
| <b>Register of Systems</b> | means a register of all systems and software to enable us to know what personal data is held by the Charity on which systems/software.   |

## 1. Introduction

As a Data Controller, we are obliged by the GDPR to provide a privacy policy to individuals when we obtain personal data from them.

This Privacy Policy applies to information we collect about individuals who interact with us. It explains what personal information we collect and how we use it.

If you have any comments or questions about this notice, feel free to contact us at

## 2. Processing personal data under the GDPR

We must process personal data lawfully, fairly and in a transparent manner. Processing data is lawful only if we are able to demonstrate that at least one lawful basis applies. The six lawful bases are:

1. Consent: the individual has given clear consent for us to process their personal data for a specific purpose.
2. Contract: the processing is necessary for a contract we have with the individual, or because they have asked us to take specific steps before entering into a contract.
3. Legal obligation: the processing is necessary for us to comply with the law (not including contractual obligations).
4. Vital interests: the processing is necessary to protect someone's life.
5. Public task: the processing is necessary for us to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law.
6. Legitimate interests: the processing is necessary for our legitimate interests of advancing our charitable objects or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.

## 3. Personal data that we process

The following table explains the types of data we collect and the lawful basis on which this data is processed.

| Purpose   | Data (key elements)   | Basis  |
|---|---|--|
| Enquiring about our organisation and its work   | Name, email, message  | Legitimate interests - it is necessary for us to read and store your message so that we can respond in the way that you would expect.  |
| Subscribing to email updates about our work   | Name, email   | Consent - you have given your active consent.  |
| Making a donation to the charity  | Name, email, address, payment information   | Legitimate interests - this information is necessary for us to fulfill your intention of donating money and your expectation of: <ul style="list-style-type: none"><li>• receiving a confirmation message; and</li><li>• if appropriate, enabling us to claim a tax refund under Gift Aid through the submission of a claim to HM Revenue &amp; Customs.</li></ul> |
| To provide a service to clients (patients, or service users) of the Parish Nurse Service. | Name, contact details, details relating to individual cases, sometimes including sensitive personal | Consent - you have given your active consent (or you have given parental consent for your child). It is especially important that we have your written permission to refer you to other services   |

|                       |   |   |
|-----------------------|---|---|
|                       | information (for example, health details, gender, date of birth and family history) | (health or social care) and to share information with them if required.   |
| Website functionality | Website activity collected through cookies  | Legitimate interests<br>- it is necessary for us to store a small amount of information, usually through cookies, to deliver functionality that you would expect, such as remembering the contents of your order before you have fully completed the process. |

#### 4. How we use your data

We will only use your data in a manner that is appropriate considering the basis on which that data was collected, as set out in Section 3 above.

For example, we may use your personal information to:

- reply to enquiries you send to us;
- handle donations or other transactions that you initiate;
- claim Gift Aid tax relief; and
- where you have specifically agreed to this, send you marketing communications by email relating to our work which we think may be of interest to you.

We will maintain a Register of Systems to ensure that we can identify where and how your personal data is stored.

#### 5. When we share your data

We will only pass your data to third parties in the following circumstances:

- you have provided your explicit consent for us to pass data to a named third party;
- we are using a third party purely for the purposes of processing data on our behalf and we have in place a data processing agreement with that third party that fulfils our legal obligations in relation to the use of third party data processors; or
- we are required by law to share your data.

In addition, we will only pass data to third parties outside of the EU where appropriate safeguards are in place as defined by Article 46 of the GDPR.

#### 6. How long we keep your data

We take the principles of data minimisation and removal seriously and have internal policies in place to ensure that we only ever ask for the minimum amount of data for the associated purpose and delete that data promptly once it is no longer required.

Where data is collected on the basis of consent, we will seek renewal of consent at least every three years.

## 7. Rights you have over your data

You have a range of rights over your data, which include the following:

- where data processing is based on consent, you may revoke this consent at any time and we will make it as easy as possible for you to do this (for example by putting 'unsubscribe' links at the bottom of all our marketing emails);
- to ask for rectification and/or deletion of your information;
- to ask for the restriction of processing of all or part of your personal data;
- to ask us for access to your information; and
- to lodge a complaint with the Information Commissioner if you feel your rights have been infringed.

A full summary of your legal rights over your data can be found on the Information Commissioner's website here: <https://ico.org.uk/your-data-matters/>

If you would like to access the rights listed above, or any other legal rights you have over your data, please get in touch with us.

Please note that relying on some of these rights, such as the right to deleting your data, will make it impossible for us to continue to deliver some services to you, if appropriate. However, where possible we will always try to allow the maximum access to your rights while continuing to deliver as many services to you as possible.

## 8. Cookies and usage tracking

A cookie is a small file of letters and numbers that is downloaded on to your computer when you visit a website. Cookies are used by many websites and can do a number of things, eg remembering your preferences, recording what you have put in your shopping basket, and counting the number of people looking at a website.

Where cookies are used to collect personal data, we list these purposes in section 3 above, along with other personal data that we collect. However, we also use some cookies that do not collect personal information but that do help us collect anonymous information about how people use our website. We use Google Analytics for this purpose. Google Analytics generates statistical and other information about website usage by means of cookies, which are stored on users' computers. The information collected by Google Analytics about usage of our website is not personally identifiable. The data is collected anonymously, stored by Google and used by us to create reports about website usage. Google's privacy policy is available at <http://www.google.com/privacypolicy.html>.

If you would like to opt-in or opt-out of using cookies, you should be able to do so using your browser. You can review your cookie settings at any time.

Please note that you cannot opt-out of the deployment of cookies that are necessary for delivery of our website or services to visitors.

## 9. Modifications

We may modify this Privacy Policy from time to time and will publish the most current version on our website. If a modification meaningfully reduces your rights, we'll notify people whose personal data we hold and is affected.

Method of distribution

Copies should be made available to all those working in any capacity on behalf of the church.

Review date

Last reviewed, April 2019

Agreed by Trustees