

DATA PRIVACY POLICY

1. Policy Control

1.1. Version description: 18/10/2023

1.2. Next review: 18/10/2024

2. General Statement

2.1. Freedom Church Romsey is committed to respecting your privacy and ensuring the personal information you have entrusted to us is processed in accordance with the Data Protection Act (1998), General Data Protection Regulation (2018) (the GDPR) and other relevant legislation relating to personal data and rights, such as the Human Rights Act (1998). This data privacy policy provides you with the necessary information regarding your rights and our obligations by explaining how we process your personal information.

2.2. At Freedom Church the Board of Trustees of the registered charity act as the Data Controller (delegated to the Data Protection Lead – see contact details below).

3. How we Collect Personal Information:

3.1. We collect personal information directly from you when you:

- Provide your details to us during a Church Meeting, for example through a “Get Connected” card.
- Provide your details to us through “MyChurchSuite”, our church management app.
- Provide your details to us through the Freedom Church website, such as by registering for more information.
- Register your children or young people to access any part of the “Freedom Kids” or “Freedom Youth” programme.
- Sign up for, buy tickets for, or attend, an event or a course.
- Complete a giving instruction (including online giving).
- Complete a Gift Aid instruction.
- Sign up to serve on a team as a volunteer.
- Apply for a role on the staff team.
- Register with one of our Freedom Centre Projects, such as Foodbank or CAP.
- Submit a query via email.
- Request to receive, or are referred to receive, Pastoral Support.
- Complete a Disclosure and Barring Service Enhanced Check or Basic Check application.

3.2. We also store non-personally identifiable information when you visit our website, through the use of cookies. Cookies are small text files that are placed on your device to help our website (www.freedomchurch.uk) to provide a better user experience. In general, cookies are used to retain user preferences, store information for things like shopping carts, and provide anonymized tracking data to third party applications like Google Analytics. As a rule, cookies will make your browsing experience better. However, you may prefer to

disable cookies on our site and on others. The most effective way to do this is to disable cookies in your browser.

4. What Personal Information does the Church Process?

4.1. The personal information we hold varies greatly depending on what information you have submitted. For example, it may be as little as just an email address, or as much detail as is disclosed in a detailed volunteer role 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 compositions, and dependents.
- Key dates (such as date of first attendance or first-time commitment).
- Financial information such as your bank details or payment card numbers.
- Whether or not you are a UK tax payer.

4.2. The General Data Protection Regulation recognises some information as “sensitive personal data”. The information we process is often 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 racial or ethnic origin, mental and physical health, details of injuries and medication or treatment received, children’s data, and criminal records, fines and other similar judicial records.

5. How does the Church use your Personal Information?

5.1. We highly value the personal information you share with us. We promise to keep your information up to date, to store or destroy it securely, to protect it from loss, misuse, unauthorized 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 and we will not use it for marketing purposes, unless you are specifically signing up for our “general communications”.

5.2. 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 mid-week meetings, courses and events.

- To maintain the church's financial accounts and records.
- To process a donation that you have made (including contacting you regarding Gift Aid information).
- To fundraise and promote the interest of the charity.
- To seek your views, comments or feedback.
- To notify you of changes to our meetings, events and role holders.
- To inform you of news, events, activities and meetings.
- 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 Freedom Church website and deliver the services that individuals have requested.
- Our processing may also include the use of CCTV systems for the prevention and prosecution of crime. These may be owned and managed by a third party.
- To determine, and invite you to, the appropriate next steps to help you fully integrate into the life of the Church.
- To contact you about any children or young people in your care and their involvement in Freedom Kids or Freedom Youth.
- To generate internal reports for the Leadership Team and/or Trustee Board to monitor growth and other Key Performance Indicators.

6. What is the legal basis for processing your Personal Information?

6.1. Most of our data is processed because it is necessary for our legitimate interests, or the legitimate interest of a third party (such as a local authority). An example of this would be our safeguarding work to protect children and adults at risk. In decision making we will always take into account your interests, rights and freedoms. As a religious organisation we are permitted to process information about your religious beliefs in the course of our legitimate activities, for example in administering contact details. Your explicit consent will be sought when you sign up to MyChurchSuite so that we can keep you informed about news, events, activities and services. Your consent will also be sought when we want to use your image online or in print. Some of our processing is necessary for carrying out legal obligations in relation to Gift Aid or under employment, social security or social protection law. 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 information in connection with the hire of a church facility or for the professional services of a church employee. In the course of our safeguarding work we may, on occasion, process criminal offence data.

7. Sharing your personal information:

7.1. 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 Statutory Organisations (such as the Police, the Local Authority and the Health Service) or our agents and contractors (such as we may ask a commercial provider to send out newsletters on our

behalf, or to maintain our database software, or to audit our accounts and manage financial processes).

8. How long do we keep your personal information?

8.1. We will endeavor to keep your information for only as long as we need it. This means that we may delete it when it is no longer necessary. 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 6 years after the calendar year to which they relate, and we will keep Trustee Board minutes indefinitely.

9. Access to your information and correction:

9.1. You have the following rights with respect to your personal information:

- The right to access information we hold on you.
 - At any point you can contact us (see contact details below) to request a copy of all the information we hold on you (known as a “subject access request”) as well as a description detailing 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 “subject access request” but additional requests for the same data may be subject to an administrative fee.
- 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 (see contact details below), and your information will be updated.
- 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 or not the information has been deleted and, if not, the reason why it cannot be deleted (for example because we need it for our legitimate interests or regulatory purpose(s)).
 - You can unsubscribe from email communications by using the “unsubscribe” link at the bottom of any email, or by managing your settings in Church Suite.
 - We may be legally precluded from erasing your data by law. If this is the case, we will notify you.
- 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 a 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 in order to defend legal claims.
- 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.
- The right to withdraw your consent to the processing of your data 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).
- The right to object to the processing of personal data where applicable.
- The right to lodge a complaint with the Information Commissioner's Office (See contact details below) or the Registered Charity Trustee Board.

9.2. When exercising any of the rights listed above, in order to process your request, we may need to verify your identity **before** you can exercise these rights. You are under no statutory or contractual obligation to provide us with your personal information, however, we will require at least basic information in order for us to deal with you as a service user in an efficient and effective manner.

10. Transfer of information abroad:

10.1. 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 contacts approved by the European Union. Our website is also accessible from overseas so on occasion some personal data may be accessed from overseas.

11. Further processing:

11.1. 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.

12. Our website:

12.1. Our website (www.freedomchurch.uk) contains links to other websites. This privacy policy only applies to our website so when you link to other websites you should read their own privacy policies.

13. Our church management system:

13.1. Freedom Church manages its database, administration, communication, events, ministries and other church systems through "ChurchSuite" – a third party website and application-based system. All users with an admin login should only use "ChurchSuite" on password protected devices. Admin users who are not actively using their Admin login will be removed. Admin users will have access to the minimum number of modules possible, whilst still being able to fulfil the requirements of their role (whether paid or voluntary). Strict management of "visibility" settings will ensure that sensitive personal information is not visible to anyone other than those who require access to it in order to fulfil the requirements of their role (whether paid or voluntary).

13.2. Individuals who are deemed to be "regular attenders" will be invited, as part of the newcomer integration process, to access "MyChurchSuite". This is a personal member

facing application which is accessible, following invite, to all regular attenders. Anyone deemed to have misused their “MyChurchSuite” access will have their access removed as soon as practicable. Invitation to use “MyChurchSuite” is at the discretion of the Freedom Church Office Team. Individuals’ data may be visible to other members of the community, but any individual can manage their own data visibility through the application. New contacts will have default visibility which includes their name and contact details – consent for this is gained through the “Get Connected” card or through the embed function on our website. We commit to regularly reviewing MyChurchSuite access.

14. Changes to our privacy policy:

14.1. We keep our privacy policy under regular review and the latest version is always available from our website or from contacting us at the email or address below.

15. Contact details

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

Address: Freedom Church, Unit 6, Greatbridge Business Park, Budds Lane, Romsey, Hampshire, S051 0HA

Email: office@freedomchurch.uk

Telephone: 01794 450451

15.2. If you have any concerns, or wish to lodge a complaint, regarding the way your information is used, please contact the Information Commissioners Office:

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

Email: <https://ico.org.uk/global/contact-us/email>

Telephone: 0303 123 1113

15.3. If you wish to submit a Subject Access Request, please contact the Church Office, who will forward your request to the Data Protection Lead:

Address: Freedom Church, Unit 6, Greatbridge Business Park, Budds Lane, Romsey, Hampshire, S051 0HA

Email: office@freedomchurch.uk

Telephone: 01794 450451

15.4. These are our registration details:

Registered Charity Number: 1154422

Information Commissioners Office Registration Number: ZA480307