

Wycliffe Baptist Church Privacy Policy v4 – revised 26/03/21

Glossary of terms

Data – any personal information about an individual

Processing – processing is the use of data by Wycliffe

Data controller – The organisation holding the data, in this case, Wycliffe

Data Processor – any party that works with data held by the data controller – Wycliffe is both a data controller and a data processor.

EEA – European Economic Area

GDPR – General Data Protection Regulation

We/Us/Our – when these terms are used we refer to Wycliffe Baptist Church

What is the purpose of this Privacy Policy

Summary

The purpose of this Privacy Policy is to tell you:

- How we collect your personal information
 - What information we may collect
- Why we use your personal information
- Who we may share your personal information with
- Where your data is stored & the tools we use
- how long we keep your personal information
- what we do to protect your personal information & who has access to it
- what choices you have in relation to your personal information

How we collect data

Wycliffe Baptist Church is a “data controller” – a collector of data.

We do this by:

i) Inputting new information about you into any of the tools we use or we may ask you to do so yourself.

ii) Collecting new information from you orally, electronically or in writing on paper forms

iii) Updating existing information if it is necessary to ‘*achieve the legitimate interests of the organisation*’ – for example adding a new phone number or an address.

What data we collect

We may collect some or all of the following:

- 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 an organised church body or status as a representative for the church in some way.
- attendance at meetings, events and training
- the result of a DBS check
- information about your use of iKnow or other data holding tools
- information we collect and record as part of pastoral care (this will include anything you tell us unless you tell us explicitly not to record it)
- payment details when booking paid events
- donations to the church, including your bank details where these are provided
- any additional 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
- Your image
- CCTV footage from one of the 3 cameras on the premises

Sensitive Personal Information

We may also collect, store and use the following “special categories” of sensitive personal information (only if you explicitly 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 information (beyond what may be disclosed on a DBS check)

Why we use 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 state that a church may use ‘legitimate interests’ to process personal information relating to those who go there for whatever reason. **We consider that ‘legitimate interests’ is the most appropriate condition under which we process your data, as you would reasonably expect that we would have to process your personal information in order to provide the full range of services offered within our church.** 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 iKnow church account
- 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
- To keep you updated on church – weekly update, emails about meetings and events, updates on any rotas you may be on etc etc

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

3.) Where we need to perform the contract we have entered into with you – i.e. without certain information there is something we cannot do for you that we have agreed together that we would.

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 iKnow (such as troubleshooting, data analysis, research)
- to tell you about changes to our website, software or iKnow that will affect your use of them
- to help us (or the software developers) improve iKnow

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

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:

- in circumstances 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)
- where we need to carry out our legal obligations (e.g. ensure DBS checking is done where appropriate)
- where it is needed in the public interest and in line with our data protection policy
- 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:

- we may record 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

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 in iKnow church and ensure that the parent are able to access and administer the account.

Where a child is 13 or over then we will permit the child to have their own iKnow 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.

Who we may share your personal information with

Other third parties

We may share parts of your information with certain third parties including:

- 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 software providers who need to see your information in order to keep our database up and running

We work with iKnow who in turn work with the following organisations all of whom will process parts or all of your data from time to time:

- Edit Websites Limited (provider of iKnow Church software – www.iknowchurch.co.uk)
- Pulsant (for storage of data)
- SendGrid (for sending emails)
- HMRC (for claiming of Gift Aid)
- WorldPay (for processing of Card Donations)
- Text Marketer (sending of text messages)
- MailChimp

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 a link to another website, 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 will only continue to store personal data relating to you where there is a reasonable possibility of an ongoing relationship. We also take account of legal obligations and accounting and tax considerations as well as considering what would be reasonable for the activity concerned. We retain personal data about gifts and gift aid declarations for up to 7 years after the tax year to which they relate.

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 choose 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 the church office.

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 communications. 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 the office.

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 the office.

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 the office 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.

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 data complaints procedure allows your request to be reviewed by THE LEAD PASTOR OR CHAIR OF CHURCH COUNCIL 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

Telephone: 03031231113

Address: Information Commissioners 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. We may change this Privacy Policy periodically to reflect changes in the law or feedback from those who use our services. Any changes will be immediately posted on our Websites and App and you will be deemed to have accepted the terms of the Privacy Policy on your first use of our Websites or iKnow or App following the changes.

How to Contact us

We welcome questions, comments and requests regarding this Privacy Policy.

To exercise all relevant rights, queries or complaints please contact us using the following details and we will do our best to assist you.

Website: www.wycliffe.church

Telephone: 01189299911

Address: Wycliffe Baptist Church

233 Kings Road

Reading

RG1 4LS

E-mail: office@wycliffe-church.org.uk

This document was last updated on May 22nd - 2020. V3

If you have any queries about this Privacy Policy or how we use your personal information, please contact the office. Our Data Protection Officer is Stewart Johnston who can be contacted **at the church office (see “how to contact us”)**.