

# TRINITY CHURCH PRIVACY POLICY

## WHO WE ARE

We are Trinity Church (Charity No: 1103028)

Trinity Church, London operates as a Christian Church primarily in the London Borough of Barnet, but also further afield through our connection with the Newfrontiers and Catalyst family of churches.

Our aim is to be a church that encourages our members to love God faithfully and serve our community diligently.

### **Our full details are:**

Trinity Church, London

Email address: [office@trinitylondon.org](mailto:office@trinitylondon.org)

### **Postal address:**

The Centre, Avion Crescent  
Grahame Park Way.  
London  
NW9 5QY

**Phone:** 0208 205 9271

It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by emailing us at [data@trinitylondon.org](mailto:data@trinitylondon.org)

Trinity Church is fully committed to ensuring that your privacy is protected as well as maintaining the security of any personal information that you send.

We strictly adhere to the requirements of the data protection legislation in the UK. You may also visit our site anonymously.

Our website is not intended for anyone under the legal age of 18, however, we do collect data relating to children if they attend one of our events or take part in JamKids or JamTots.

**It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data.**

## **WHAT IS PERSONAL DATA?**

Personal data, or personal information, simply means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

Trinity Church may collect, use, store and transfer different kinds of personal data about you in order to serve you better. The types of data we collect from you are listed out as follows:

1. **Data relating to your Identity:** This would include your first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender or sexual orientation.
2. **Data relating to your contact information:** This includes postal address, delivery address, email address and telephone numbers.
3. **Data relating to your Finances:** This includes bank account and payment card details.
4. **Data relating to your transactions:** This includes details about payments to and from you and other details of events, products or services you have purchased from us or gifts you have donated to us. e.g. weekend away or Catalyst events.
5. **Technical Data** which includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
6. **Profile Data** includes your username and password, purchases or orders made by you, your interests and preferences

7. **Usage Data** includes information about how you use our website, events, products and services.
8. **Communications Data** includes your preferences in receiving Newsletters from us and your communication preferences.

## WHY DO WE COLLECT YOUR DATA?

The information we collect from you is used to manage and administer the church and to carry out our charitable purposes.

We will only use your personal data when the law allows us to.

Examples of how we would use your personal data are as follows: -

1. Where we need to perform the contract we are about to enter into or have entered into with you. (If you register for an event for instance, we need your details to be able to complete registration).
2. Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests.

Generally, we do not rely on consent as a legal basis for processing your personal data other than when we collect special categories of data or in relation to sending direct marketing communications to you via email or text message.

You have the full right to withdraw consent to marketing at any time by clicking on an unsubscribe link in one of our emails to you or by emailing [data@trinitylondon.org](mailto:data@trinitylondon.org)

## AT WHAT POINT DO WE COLLECT YOUR PERSONAL DATA?

When you interact with us through our services, register for an event, donate or complete a form, sign up for our newsletter, apply to volunteer for us or work as a member of our staff team, it is necessary for us to collect certain information from you to enable us serve you better.

We usually collect general information about you such as your name, contact details and email addresses, postal addresses and date of birth information.

Other data we may collect are as follows:

## 1. Google Analytics:

When you visit [www.trinitylondon.org](http://www.trinitylondon.org) we use a third party service, Google Analytics, to collect standard internet log information and details of your browsing behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify you. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website.

You can check out [Google's privacy policy here](#) .

When you place orders or access your account information, we offer the use of a secure server. The secure server software (SSL) encrypts all information you input before it is sent to us. Furthermore, as required by the UK Data Protection Acts of 1984 and 1998, we follow strict security procedures in the storage and disclosure of information, which you have given us, to prevent unauthorised access. Our security procedures mean that we may occasionally request proof of identity before we are able to disclose sensitive information to you.

## 2. Mailing Lists:

When you give us your email address and mobile number, we also collect your information.

The reasons we ask for your information are:

- a. to send you our weekly newsletters which contain information about church news, and events.
- b. If you are a volunteer, we send reminders to you (via text local and Churchsuite) to update you on serving dates and times.

**We NEVER EVER rent or trade email lists with other organisations and businesses.**

We use a third-party provider, Churchsuite, to deliver our newsletter and to process your payments. We gather statistics around email opening and clicks using industry standard technologies to help us monitor and improve our e-newsletter. For more information, please see [Churchsuite's privacy notice](#).

You can unsubscribe to general mailings at any time by clicking the unsubscribe link at the bottom of any of our emails or by emailing our data protection officer at [data@trinitylondon.org](mailto:data@trinitylondon.org)

### **3. Giving Envelopes:**

When you give your offerings, tithes and gifts, via our offering envelopes, we collect financial information such as your name, address and bank details in order to process the payments. Payments are processed via Churchsuite via an encrypted password only server.

Once your payments have been processed, we destroy enough information to make further payments impossible.

We also store the envelopes in a safe and secure place for a period of 7 years as mandated by law.

### **PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA:**

As a church it is necessary for us to collect and store your personal data. Reasons include:

- a. For us to effectively manage, administer and promote Trinity Church
- b. To enable us effectively administer financial transactions and donations
- c. Effective running our courses or events
- d. To help us manage our website and social media accounts
- e. Manage and support our volunteers and staff team
- f. Prevent and detect crime
- g. To help us comply with a legal or regulatory obligation
- h. To send you our weekly newsletter

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please email [data@trinitylondon.org](mailto:data@trinitylondon.org) if you need details about the specific legal ground we are relying on to process your personal data.

### **CHANGE OF PURPOSE**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please email [data@trinitylondon.org](mailto:data@trinitylondon.org)

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **HOW SAFE IS MY PERSONAL DATA?**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know.

They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **HOW LONG WILL YOU USE MY PERSONAL DATA FOR?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by emailing [data@trinitylondon.org](mailto:data@trinitylondon.org).

## **WHAT ARE MY LEGAL RIGHTS?**

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

If you wish to exercise any of the rights, please email [data@trinitylondon.org](mailto:data@trinitylondon.org)

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

## **WHAT WE MAY NEED FROM YOU**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

## **TIME LIMIT TO RESPOND**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

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## **YOUR LEGAL RIGHTS**

You have the right to:

1. Request **access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
2. Request **correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us. Please note that you can access and edit the data we hold for you via MyTrinity.
3. Request **erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it.
4. You also have the right to ask us to delete or **remove** your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
5. Object to processing of your personal data where we are relying on a **legitimate interest** (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
6. Request **restriction** of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
  - (a) if you want us to establish the data's accuracy;
  - (b) where our use of the data is unlawful but you do not want us to erase it;
  - (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or

(d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

7. Request the **transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
8. **Withdraw** consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

The policy was created on 22 May 2018