



PRIVACY POLICY

The Co-Mission Churches Trust, and our churches and ministries, seek to advance the Christian faith throughout London and to love and serve our local communities. Therefore, we are committed to doing good and to maintaining the trust and confidence of our church members, guests, friends, local communities and, indeed, of all visitors to this website. In particular, we would never even contemplate selling, renting or trading email lists or other personal information for marketing or any other commercial purpose. The purpose of this policy is to provide you with information about when and why we collect your personal information and how we use it. We hope you find this privacy policy helpful.

This policy was last updated on 5th November 2020.

WHO WE ARE AND WHAT THIS PRIVACY POLICY COVERS

The Co-Mission Churches Trust (“CMCT”) is a registered charity (no. 1139922) and limited company (no. 07496944). Our churches include: The Boathouse Church Putney, Christ Church at All Saints Wandsworth, Christ Church Balham, Cornerstone Church Kingston, Dundonald Church, Grace Church Worcester Park, Hope Church Sutton and King’s Church Walton.

The purpose of this policy is to inform you about when and why we collect your personal data, how we use it, what our responsibilities are and what your rights are. **“Personal data”** means any information relating to an identifiable living person. It includes their name, physical address, email address, telephone number, health information or any other information about them, whether at home or at work.

Our aim is for you to understand how and why we use your personal data. It is important that you read this privacy policy together with any other privacy notice we provide on specific occasions when collecting or processing your personal data so that you are fully aware of our data processing activities. If you do have any queries or concerns, please contact the appropriate church’s staff/eldership team in the first instance, or contact the CMCT charity services team by email: cmct-privacy@co-mission.org

OUR RESPONSIBILITIES TO YOU

As an organisation in the UK, we adhere to all UK data protection legislation including the Data Protection Act 2018 and all legislation implementing the General Data Protection Regulation (“**GDPR**”). We are registered with the UK Information Commissioner’s Office (“**ICO**”), with the registration number ZA504349. The GDPR places a responsibility on us to not just to obey the letter of the law, but to build data protection in to everything we do.

In particular, we will:

- keep you informed about how your data is being used
- keep personal data up to date
- store and destroy personal data securely
- not collect or retain excessive amounts of data



- use reasonable measures 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.

Below you will find detailed information about how your personal data may be obtained, what it is then used for and what your rights are in respect of that data.

1. HOW WE OBTAIN AND USE INFORMATION ABOUT YOU

a. Information which you provide us

You may provide us with personal data in many situations, such as when/if you:

- fill in one of our feedback/help/enquiry forms on one of our websites (see appendix for an explanation of cookies);
- leave a comment on one of our social media pages;
- give your contact details for the purposes of NHS Test & Trace while attending one of our events, prayer meetings or Sunday services;
- complete a welcome card;
- apply for a Disclosure & Barring Service (“DBS”) check;
- place your child in one of our crèche or Sunday School classes;
- sign up for a course or event (e.g. a marriage course / Christianity Explored Course);
- sign your child up to attend a children’s/youth club or event (e.g. a children’s holiday club);
- join a Bible study group, a ministry team or group and/or join a serving rota;
- attend a group run at one of our churches;
- participate in a church activity which is being photographed or filmed;
- email us or phone us or meet us in person (including for the purposes of pastoral care, encouragement, training and/or prayer)
- make a donation or pay for activities such as a weekend away;
- complete a giving/fundraising and/or gift aid form;
- request our involvement with a baptism, confirmation, wedding or funeral;
- volunteer at one of our churches or with an affiliated/associated ministry;
- apply for a role with CMCT or one of its churches or an affiliated/associated ministry;
- are employed on the staff team at one of our churches or an affiliated or associated ministry;
- are appointed as an Elder of one of our churches;
- make a complaint under the CMCT Complaints Policy;
- update your details or upload a photo via one of our church management systems (e.g. ChurchSuite).

b. Information we receive from other sources

We also collect information about you which you have provided to reputable third parties that we use (other Co-Mission churches or third parties that we choose to use e.g. Eventbrite, Ticket Tailor or Brushfire in relation to event bookings). We ensure that any third parties we use operate in accordance with UK data protection legislation.



c. Children's data

We will collect and process personal data of children below the age of 16 when they attend Sunday School, a children's/youth club or an external event. This is to enable us to provide good care at such programmes, know who to contact in case of emergency, and fulfil our safeguarding obligations. If you learn that a child under 16 has provided us with personal information without their parent or guardian's permission, please contact us.

d. Personal data which you provide on behalf of someone else

If you give us information on behalf of someone else, you must be sure that the other person has appointed you to act on their behalf and has agreed that you can (i) make decisions about the processing of their personal data; and (ii) receive on their behalf any data protection notices.

Parents and legal guardians are responsible for the personal data of their children.

2. THE LAWFUL BASIS FOR PROCESSING PERSONAL DATA AND HOW WE USE YOUR INFORMATION

a. Lawful Basis

We will process your data on one of the following bases:

- because it is necessary for our legitimate interests or the legitimate interests of a third party;
- it is necessary for compliance with a legal obligation;
- where we have your consent; or
- if it is necessary for the performance of a contract (e.g. an employment contract or a contract to hire premises), or to take steps to enter into a contract.

In the majority of cases, we process personal data because it is necessary for our legitimate interests.

b. What we use your data for

Where relevant, we will use your data for the following purposes:

- to include you within your relevant church directory or address book;
- to include you on a church management system used by your church (e.g. ChurchSuite or Elvanto);
- to communicate with you in relation to rotas and/or groups that you may join or be interested in (including Bible study groups) both within your church and the wider Co-Mission network;
- where you wish to help out with one of our children's or youth ministries or you wish to join one of our driving rotas which may include driving an adult at risk (or you wish to help with another ministry or event which requires a DBS check), to carry out comprehensive safeguarding procedures 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 provide you with adequate pastoral care and/or support;
- for promotional purposes (e.g. a photograph on one of our websites/social media accounts);
- to organise and/or perform services for you such as baptisms, confirmations, weddings and funerals;



- to enable you to register or book yourself or your child onto one of our events or courses or a Co-Mission event or course;
- to enable you to place your child in one of our crèche or Sunday School classes;
- to enable you to sign your child up for a children's or youth group or club at one of our churches or another Co-Mission church;
- to respond to your enquiries in relation to any of our churches or ministries (or those of the wider Co-Mission network or any events they may run e.g. Revive Bible festival);
- so that we can tell you about other information or events relating to any of our churches or ministries (or those of the wider Co-Mission network) that we think may be of interest to you;
- to notify you of changes to any services and/or events;
- to enable you to register on any of our websites to access information;
- to seek your views or comments;
- to handle any complaint you make under the CMCT Complaints Policy;
- where it is necessary for the preparation or performance of a contract with you;
- where it is necessary in connection with a professional or legal obligation;
- to remember your preferences e.g. if you ask not to receive fundraising materials;
- to discuss volunteer opportunities with you;
- if you apply for a job to consider you for employment;
- to customise our websites and content to your particular preferences;
- to notify you of any changes to our websites or to our services that may affect you;
- to detect and prevent fraud/crime (e.g. CCTV images may be used to prevent, deter and detect crime and to provide evidence in the courts);
- to monitor and assess the quality of our services;
- to fulfil our obligations to record who attends our services and events via NHS Test & Trace during the COVID-19 pandemic;
- for other everyday charity and church purposes, such as internal record keeping, payment processing and financial account management, claiming gift aid on donations, contract management, website administration, analytics, corporate governance, reporting and legal compliance.

We will only use your information for the purpose it was collected (or for very similar/related purposes), unless an exceptional circumstance arises where we are legally required to disclose data. In all other cases, if we want to use your personal data for anything other than the reason it was collected, we will contact you beforehand.

c. Sensitive personal data

The data we collect may constitute sensitive personal data* (e.g. data concerning health in relation to pastoral care/Sunday School classes/children's clubs/events) but we will only process such data:

- with your explicit consent; or
- being a not for profit organisation with a religious aim, if the processing is carried out in the course of our legitimate activities with appropriate safeguards and the processing relates solely to members (or former members) or others with whom we are in regular contact in connection with our charitable purposes and such data is not disclosed outside of our organisation; or
- if the processing is necessary for the purposes of exercising the employment law rights or obligations of CMCT or the data subject; or
- if the processing is necessary to protect the data subject's vital interests, and the data subject is physically incapable of giving consent; or



- if the processing relates to personal data which is manifestly made public by the data subject; or
- if the processing is necessary for the establishment, exercise or defence of legal claims; or
- if the processing is necessary for reasons of substantial public interest.

We will always treat sensitive personal data with the greatest care.

* GDPR refers to “**sensitive personal data**” as ‘special categories of personal data’ (Article 9, GDPR) and includes data consisting of racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning health or data concerning a natural person’s sex life or sexual orientation. Personal data relating to criminal convictions and offences are not included within the definition of sensitive personal data under GDPR but similar extra safeguards apply to its processing (Article 10, GDPR).

3. WHO YOUR PERSONAL DATA MAY BE SHARED WITH

We recognise that your information is valuable and will take all reasonable measures to protect your information. Generally, we will not share your personal data with others outside of CMCT. In most cases, only our employees, workers and volunteers approved by us, will see and process your data.

However, there are situations where your data might be made visible to others, for example, where you are a regular at one of our churches, your contact details might be made available to other regulars at that church in the form of a church address book or directory. This is because it is in the legitimate interests of the church family to be able to contact one another and provide care, support and encouragement to one another. In such circumstances, safeguards will be put in place and you will be given the opportunity to update your information and also to have your details removed from the church address book or directory.

Your personal data may be transferred to:

- third party companies or individuals for the purpose of facilitating events on our behalf;
- third party service providers (including but not limited to Google, Microsoft Office, Dropbox, ChurchSuite, Elvanto and Cognito Forms) who store/process information on our behalf, including providers of information technology, identity management, website hosting and management, data analysis, data back-up, security and storage services;
- Eventbrite, Ticket Tailor, Brushfire or other third party booking service providers or payment gateway providers to process any event/training bookings/payments;
- payment processors e.g. banks or card payment intermediaries;
- validation service providers to confirm your address and ensure any direct debit instructions are set up correctly;
- mailing or printing agents, contractors and advisers that provide a service to us or act as our agents;
- our payroll processors so that we can properly pay our employees and our auditors so that they can fulfil their regulatory duties; and
- insurance companies, law enforcement, regulatory, or other government/statutory bodies (e.g. HMRC or the Charity Commission) for the purposes of fraud prevention and/or to comply with any legal and regulatory issues and disclosures.



We do not sell, rent, distribute or otherwise make personal data commercially available to any third party except as described in this policy or with your prior permission.

4. SECURITY AND PROTECTION OF YOUR PERSONAL DATA

We use reasonable technical, administrative and physical controls to safeguard your personal data from unlawful use and unauthorised disclosure. In addition, we limit access to your personal data to those CMCT employees/workers, church volunteers and church elders who need to have access and they will only process your personal data on our instructions. In all cases we will ensure that any access or transfer of your personal data is compliant with UK data protection law.

Where we use third parties (see above) to provide elements of our service and/or to process data on our behalf they are bound by law or contract to protect your personal data and only use it in accordance with our instructions. We only allow third parties to handle your personal data on the understanding that they will keep the information confidential.

We normally only store your personal data within the European Economic Area (“EEA”). If one of our service providers (e.g. a payment gateway provider or payment processor such as Eventbrite, an online form builder such as Cognito Forms or an online server/storage provider such as Google/Microsoft Office) needs to transfer your personal data outside of the EEA then we will either ensure a data protection level equal to the one in the EEA or we will obtain your consent to the transfer. For example, if you book onto one of our training courses through Eventbrite, if you complete our safeguarding application form/self-declaration form or if we store your personal data on Google Drive’s secure servers they may transfer your personal data outside of the EEA as they are US organisations – these third party organisations do however participate in and comply with the EU-US Privacy Shield Framework and accordingly the European Union allows the transfer.

All our staff who have access to personal and/or confidential information are subject to confidentiality obligations and may be subject to discipline including dismissal if they fail to meet these obligations. Church volunteers who process personal information on our behalf are also required to comply with our Data Protection Policy.

While we will use all reasonable efforts to safeguard your personal data, the use of the internet is not entirely secure and we cannot absolutely guarantee the security or integrity of any personal data that is transferred from you or to you via the internet. If you would like detailed information on how to protect your information and your computers and devices against fraud, identity theft, viruses and other online problems you can visit www.getsafeonline.org, which is supported by HM Government and leading businesses.

5. DATA RETENTION

Ordinarily, we will retain core personal data such as your contact details for as long as you are a regular attendee at the church/ministry. Once you are no longer part of the church/ministry or in contact with it, these details will be deleted within one year.

As mentioned, part of our responsibility to you is to ensure we do not collect large amounts of unnecessary data. Therefore, personal data given for a specific purpose (such as a one-off church event), will only be kept for as long as necessary to carry out that purpose, then deleted within one year.



If you give your personal details for the purposes of NHS Test and Trace, we have a legal obligation to retain this data for 21 days after the service or event that you gave them.

In some circumstances, personal data needs to be retained for long periods of time. Specifically, these circumstances are that:

- Financial information must be retained for a minimum of six years after it is provided, even if you no longer attend a CMCT church. This includes records of your donations to a CMCT church, any payments made to you (such as expenses) and your gift aid declaration if you have provided one.
- Sunday Schools and youth clubs must indefinitely retain simple registers of who attended their programmes to fulfil safeguarding obligations.

6. LINKS TO THIRD PARTY SITES

This privacy policy only addresses the use and disclosure of personal data by us. Our websites may contain links to other websites which may be of interest to you. In addition, we may provide social sharing and follow buttons, for example to Facebook and Twitter, on our website. If you use or follow these links or buttons to any of these third party sites, please be aware that they have their own cookies and privacy policies which we recommend you read. We do not control these other sites and we cannot be responsible for the content of these sites or for protection of any information you provide to other sites. You should be cautious when entering personal data online.

7. YOUR RIGHTS

We want to ensure you remain in control of your personal data. Part of this is making sure you understand your legal rights. You have a number of legal rights under applicable data protection legislation in relation to the personal data that we hold about you, including:

- The right to **access** (a copy of) particular personal data that we hold about you and certain supplementary information (e.g. the sources from which we acquired the information, the purposes for processing the information and the persons/entities with whom we are sharing the information). We may (i) refuse to provide details and/or (ii) charge an appropriate fee, if relevant legislation allows us to do so, in which case we will provide reasons for our decision as required by law.
- The right to ask that we **erase your information** in certain circumstances. Please note that there may be circumstances where you ask us to erase your information but we are legally required or entitled to retain it (e.g. information that is required for audit purposes or registers of children's attendance for safeguarding purposes).
- The right to **withdraw your consent** to the use of your information where we are relying on that consent (for example, you can opt out of receiving email notifications from us). Please note that we may still be entitled to process your information if we have another legitimate reason (other than consent) for doing so.
- In some circumstances, you have the right to receive some of your information in a usable format and/or request we transmit that data to a third party where this is technically feasible. Please note that this **right of transfer** only applies to information which you have provided to us.
- The right to ask that we **update** your personal data free of charge, if it is inaccurate or incomplete.



- The right to request that we **restrict** the processing of your personal data in certain circumstances. Again, there may be circumstances where you ask us to restrict the processing of your information, but we are legally entitled to refuse that request.
- You have the right to **opt out from receiving marketing** materials (including fundraising materials) from us. You can do this by contacting us or by replying to the correspondence and requesting an update to your correspondence settings.
- The right to **make a complaint** with the Information Commissioner if, after raising your concern with us and making a privacy complaint, you think that any of your rights have been infringed by us. The ICO's contact details can be found at www.ico.org.uk.

You can exercise your rights by contacting us. Please note that we usually act on requests and provide information free of charge. We may however be entitled to refuse to act on a request and we may charge a reasonable fee in relation to our administrative costs if the request is baseless, excessive or repeated.

We will respond to you as soon as we can. This will generally be within one month from the date we receive your request but if your request is going to take longer to deal with we will let you know.

8. MAKING A PRIVACY COMPLAINT

If you want to submit a written complaint about how we handle your personal data, please contact us or email us at cmct-privacy@co-mission.org. If you make a privacy complaint, we will respond to let you know how your complaint will be handled. We may ask you for further details, consult with other parties and keep records regarding your complaint.

9. CONTACT AND FURTHER INFORMATION

If you have any questions or concerns about this privacy policy or the information we hold about you please contact us or email us at cmct-privacy@co-mission.org.

10. CHANGES TO OUR PRIVACY POLICY

This policy is subject to a review at least every two years and will be updated when the law or best practice changes. You should therefore check this policy regularly to ensure that you are aware of any changes.



APPENDIX: USE OF COOKIES AND SIMILAR TECHNOLOGIES

We may use cookies and similar technologies such as pixel tags and web beacons on our websites and in some of our emails.

a. What is a cookie?

A cookie is a small text file (letters and/or numbers) which is sent to and stored on your computer (or other electronic device). Cookies are used to identify you whenever you visit a website, to remember what you have done on a website to help improve your browsing experience, to remember log-ins or to provide advertising while visiting a particular site.

There are many types of cookies but broadly they can be grouped by purpose:

- **strictly necessary cookies** which are used e.g. to make a website work and to manage the login and access to reserved functions of a site (these cookies are limited to the working session and are deleted once the browser is closed);
- **performance cookies** which collect information about how websites are used (e.g. which pages are visited, providing statistics on how a website is used and measuring any errors that occur);
- **functionality cookies** which are used to remember settings and to personalise content when a user returns to a website; and
- **targeting cookies** which are linked to services provided by third parties and which are used e.g. to link to social networks such as Facebook via “Like” or “Share” buttons (the third party may subsequently use information about a user’s visit to target advertising to them on other websites) or to provide advertising agencies with information on a user’s visit to a website so that they can present users with advertisements that they may be interested in.

Cookies can also be grouped according to whether they are ‘first-party’ cookies or ‘third-party’ cookies. The difference is that first-party cookies are placed and controlled by the website you are visiting whereas third-party cookies are placed and controlled by a third-party.

b. What are pixel tags and web beacons?

Pixel tags and web beacons are tiny graphic images embedded in a web page or in emails to achieve similar purposes as those described above. For example, web beacons can be used to see which email messages are opened or forwarded to enable a better understanding of which types of email messages people are interested in and to help improve communication.

c. How to manage cookies and control your privacy

You can decide whether or not to accept or reject cookies. Most web browsers allow some control of most cookies through the browser settings – these settings will typically be found in the ‘options’ or ‘preferences’ menu of your internet browser.

To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, please visit www.allaboutcookies.org and www.youronlinechoices.eu. For a video about cookies please visit www.google.co.uk/policies/technologies/cookies.



The exact procedure to prevent new cookies from being installed and how to delete existing cookies depends on which browser you are using but the following links may be helpful:

- Internet Explorer
<http://windows.microsoft.com/en-GB/internet-explorer/delete-manage-cookies>
- Safari
<http://help.apple.com/safari/mac/8.0/#/sfri11471>
- Google Chrome
<https://support.google.com/chrome/answer/95647?hl=en>
- Firefox
<https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>
and
<https://support.mozilla.org/en-US/kb/delete-cookies-remove-info-websites-stored>

You can choose to disable cookies in your internet browser but please note that if you delete cookies or decline to accept them you may not be able to use all of the features we offer, or store your preferences; in addition, some of our web pages might not display properly. If you want to turn off the more invasive cookies but leave most other functionality in working order, then a good option is to turn off third-party cookies using your browser settings.

In addition, we recommend that you check your privacy settings on any site which requires you to register or login, and that you never save your passwords in your browser or on your device, other than in a reputable password management system.