

Privacy Policy

Welcome to New Life Church Privacy Notice

New Life Church respects your privacy and is committed to protecting your personal data. This privacy notice will inform you how New Life Church (NLC) looks after your personal data and tell you about your privacy rights and how the law protects you.

The Privacy Notice is provided in a layer format so you can click through to the specific areas set out below. please also use the glossary to understand the meaning of some of the terms used.

1. What This Private Notice Covers

We will collect and deal with your personal information in accordance with the Data Protection Regulation (UK GDPR) tailored by the Data Protection Act 2018. For the purpose of this Act, we, New Life Church Trustees, are the data controller of personal data we hold about you. This Privacy Notice aims to give you information about how New Life Church collects and processes your personal data, including any data you may provide through this website, when you interact with us, register for an event, donate to the church, apply for a role as a volunteer or staff member or sign up to our newsletter.

This website is not intended for children; however we do collect data relating to children if they attend one of our events or take part in our New Life Kids or Youth activities.

2. Personal Data We May Collect From You

Personal data or personal information 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)

We may collect, store and transfer different kinds of personal data about you which we have grouped together as follows:

- Identity Data – includes first name, maiden name, last name, username (or similar identifier), marital status, title, date of birth, gender, photograph, video footage and any other biographical information you may have provided us.
- Contact Data – includes billing address, delivery address, email address and telephone numbers
- Financial data – includes bank account and if relevant payment card details
- Transactional Data – about payments to and from you and other details of event, product or service you have purchased from us or gifts you have donated to us
- Technical Data – includes internet protocol (IP) address, your login data, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access website.
- Profile data – includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses
- Usage data – includes information about how you use our website, events, products and services
- Marketing & Communication data – includes your preferences in receiving marketing from us and our third parties and your communication preferences

3.1 Special Categories Personal Data

As a faith-based charity providing Christian teaching and training, the information we collect may be considered to come within the definition of Special Categories of Personal Data.

New Life Church processes special category data as defined under UK GDPR .

- Personal data: revealing racial or ethnic origin and religious/ philosophical beliefs.
- Data concerning health, sexual orientation or a person's sex life

To process this data NLC must meet additional conditions:

- The data subject must have given explicit consent
- Processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law.
- Processing is necessary to protect the vital interests of the data subject or another natural person where the data subject is physically or legally incapable of giving consent
- Processing is carried out in the course of its legitimate activities with appropriate safeguards by specific organisations on conditions that the processing relates solely to the members or to the former members of that organisation.

3. How We Will Collect Personal Data

We will collect and handle your personal information either with your explicit consent or because it is necessary for us to do so for the purpose of our legitimate interests outlined above.

There are different methods that we may collect data from and about you which include:

Direct interaction

You may give us your identity, contact, and financial data by joining ChurchSuite, completing forms or corresponding with us by phone, email or by post. This includes personal data you provide when you:

- Are involved in the life of the church through services, groups or activities
- Photographed or filmed during our services or events
- Apply to volunteer with us
- When we ask you to undertake a DBS check prior to volunteering with us
- Request pastoral assistance
- Donate online, by text, or just giving
- Create an account on ChurchSuite
- Register for an event or course
- Subscribe to our services or publications
- Request marketing to be sent to you
- Respond to a survey

- Give us feedback

Automatic Technologies or interactions

As you interact with our website, Eventbrite and social media we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our cookie policy for further details.

Third Parties or publicly available sources

We may receive personal data about you from various third parties and public sources as set out below:

- Technical Data from analytics providers such as Google based outside the EU.
- Identity and Contact Data from publicly available sources such as companies House

4. How We Use Your Personal Data

As a church, we hold data of the people in our congregation, volunteers, guest and service users and use this information to coordinate church activities and to keep you informed of things happening in the life of the church.

We also collect and use information about our suppliers, contractors, elders, staff, student placements, volunteers and personnel working for relevant public bodies. This information is used to manage and administer the church and carry our charitable purposes. We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Manage, administer and promote the life of the church
- Manage our volunteers and HR function
- Administer events and courses
- Manage our websites, social media and ChurchSuite
- To manage our financial transactions & donations and communications across entities
- To help us ensure that you meet the criteria for membership
- To enable to maintain appropriate safeguarding arrangements for our children, youth and vulnerable adults
- Where we need to adhere with a legal or regulatory obligation
- To help us better support you and to provide pastoral care, support, teaching and challenge for you in accordance with the teaching of the Bible
- Exceptionally, to deal with church discipline in accordance with the church's constitution.

5. Marketing

We strive to provide you with choices regarding personal data uses, particularly around marketing and advertising. You will receive marketing communication from us if you have requested information from us or purchased goods, attended an event or course with us and in each case where you have expressed and opt-in consent before receiving that marketing.

We will get your expressed opt-in consent before we share personal information with any company outside New Life Church, for marketing purposes. You can ask us or third parties to stop sending you marketing messages by contacting the church office admin@newlifemilton.org at any time. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of an event registration or other financial transactions.

You can set your browser to refuse all or some browser cookies or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of New Life Church website may become inaccessible or not function properly. You can read more about how we use cookies by reading our *Cookies Policy*.

Change of Purpose

We will only use your personal data for the purposes for which we collect 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 admin@newlifemilton.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.

6. Who We May Share Your Data With

We will share some of your personal data with the parties set out below for the purposes mentioned in paragraph 5.

- Internal third parties as set out in the *Glossary*
- External Third Parties as set out in the *Glossary*
- Third parties to whom we may choose to sell, transfer or merge parts of our activities or assets. If a change happens, your personal data will be used in the same way as set out in this privacy notice

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third party service providers to use your personal data for their own purposes and only permit them to process your personal data for specific purposes and in accordance with our instructions.

7. International Transfers

In the course of carrying out our business, NLC may need to transfer personal data information to a country outside the European Economic Area (EEA) including to any group company or to another person with whom we have a business relationship.

Personal data will only be transferred to a country outside of the EEA if there are adequate protections in place. To ensure that personal data receives an adequate level of protection, NLC has put in place appropriate procedures with the third parties we share personal data with to ensure the personal data is treated by those third parties in a way that is consistent with and which respects the law on data protection. (see Glossary for more details)

8. Data Security

We will use appropriate technical and organisational measures to keep personal data secure and in particular to protect against unauthorised or unlawful processing and against accidental loss, destruction or damage. These are set out in our Data Protection Security Policy & Process

We have put into 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 staff, 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.

9. Data Retention

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 collect it for, including for the purpose 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 of 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. Also advisement has been taken from Chartered Institute of Personnel & Development

Details of retention periods for different aspects of your personal data are available in our Data Protection Procedures which you can request from us by emailing us on admin@newlifemilton.org

10. Your Rights

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

- a. *Request access to your personal data.*
- b. *Request correction of your personal data.*
- c. *Request erasure of your personal data.*
- d. *Object to processing of your personal data*
- e. *Request restriction of processing your personal data*
- f. *Request transfer of your personal data.*
- g. *Right to withdraw consent*

A full explanation of these rights is in the Glossary, Section 16. If you wish to exercise any of the rights set out above please contact us email admin@newlifemilton.org

11. Fees

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 certain circumstances.

12. 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.

13. 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.

14. Responsibility Statement

The information contained in this policy represents New Life Church (NLC), New Milton interpretation of the law as at the date of this edition. NLC takes all reasonable care to ensure that the information contained in this policy is accurate and that any opinions, interpretations and guidance expressed have been carefully considered in the context in which they are expressed.

15. Glossary

15.1 Lawful Basis

The UK GDPR Article 6, states organisations must have a lawful basis in order to process personal data and provides six categories. New Life Church lawful basis is:

Legal Obligation: To comply with a Legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to

Consent :that the individual has given a clear consent for their personal data to be used for a specific purpose. Consent requires a positive opt in. No pre-ticked boxes or any other method of default consent

Vital Interest means that processing is necessary to protect someone's life. (Pastoral needs/ Safeguarding. Risk to mental/emotional/physical health)

15.2 Your Legal Rights

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

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.

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. You 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.

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 overrides your rights and freedoms.

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 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.

Request transfer of your personal data to you or 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.

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.

15.3 Third Parties

External Third Parties

- Service providers acting as processors based in UK who provide website, social media, media and IT and system administration services
- Course and event management systems including Eventbrite and Raiser’s Edge.
- Electronic marketing and research services such as Mailchimp* and SurveyMonkey*
- Contact databases such as ChurchSuite and Raisers Edge*
- Professional advisers including lawyers, bankers, auditors, pension advisors and insurers based in UK who provide consultancy , banking, legal , insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the UK who require reporting of processing activities in certain circumstances
- Zoom, who provide an online video conferencing service that we use for meetings, courses, events and training.

External Third Parties Privacy Policies (for online services only):

Raiser’s Edge (owned and controlled by Blackbaud) MailChimp, SurveyMonkey* and Eventbrite* are US based companies and are certified under Privacy Shield.

- Blackbaud’s* [Privacy Policy](#)
- Eventbrite’s* [Privacy Policy](#)
- MailChimp’s* [Privacy Policy](#)
- SurveyMonkey’s * [Privacy Policy](#)
- Squarespace [Privacy Policy](#)
- Zoom’s [Privacy Policy](#)
- YouTube [Privacy Policy](#)
- iCloud [Privacy Policy](#)