

PRIVACY POLICY

The Co-Mission Initiative 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. With the arrival of new European law, this gives us a wonderful opportunity to provide you with lots of detailed 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 23rd May 2018.

Who we are and what this privacy policy covers

This is the privacy policy of The Co-Mission Initiative Trust (Company no. 08848067 and registered charity no. 1157383) and of our churches and ministries (“we”, “us” or “CMIT”). Primarily, CMIT is focused on developing the Co-Mission network of churches and on advancing Co-Mission’s church planting strategy, but for a short transitional period, the we are also responsible for Streatham Central Church, Roehampton Student Church and Mosaic Multicultural Church. This important policy explains how CMIT may collect, process, protect and share personal data* about you and the rights you have in relation to your personal data. Please note that this policy relates to all our church and ministry activities, not just this website.

It is important that you read this privacy policy together with any other privacy 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.

* **personal data** means any information that may be used to identify an individual, including, but not limited to, a first and last name, a physical address, an email address, a telephone number or other contact information, whether at home or at work. Identification can be by the information alone or in conjunction with any other information.

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/the Revive Bible Festival or other events) but we will only process such data:

- (i) with your explicit consent; or
- (ii) 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

- (iii) if the processing is necessary for the purposes of exercising the employment law rights or obligations of CMIT or the data subject; or
- (iv) if the processing is necessary to protect the data subject's vital interests, and the data subject is physically incapable of giving consent; or
- (v) if the processing relates to personal data which is manifestly made public by the data subject; or
- (vi) if the processing is necessary for the establishment, exercise or defence of legal claims; or
- (vii) 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).

Our commitment to you

We are committed to respecting your privacy and to protecting your personal data. Furthermore, we fully endorse and will adhere to all UK data protection legislation including the principles of the UK Data Protection Act 1998, any subsequent amendments thereto and all legislation implementing the General Data Protection Regulation (Regulation (EU) 2016/679) (the "**GDPR**").

In particular we will comply with our legal obligations to keep personal data up to date, to store and destroy it securely, to not collect or retain excessive amounts of data, to 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.

How you consent to this privacy policy

By using any of our websites and by providing us with any personal data, you are consenting to the use of that information as set out in this policy.

Please do not send us any information if you do not want it to be used in this way.

Personal data which you provide on behalf of someone else

If you give us information on behalf of someone else, you confirm that the other person has appointed you to act on his/her behalf and has agreed that you can (i) give consent on his/her

behalf to the processing of his/her personal data and (ii) receive on his/her behalf any data protection notices.

How we obtain information about you

1. 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;
- leave a comment on one of our social media pages;
- attend one of our events (such as the Revive Bible Festival), 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 or enquirers’ group;
- join a ministry team or group;
- join a serving rota in relation to one of our churches or ministries;
- attend a toddler group run at one of our churches;
- 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 Co-Mission or one of its churches or an affiliated/associated ministry;
- are employed on the Co-Mission staff team or at one of our churches or an affiliated or associated ministry;
- are appointed as an Elder of one of our churches;
- update your details or upload a photo via one of the church management systems that our churches may use (e.g. ChurchSuite).

2. Information we collect about you

We collect information about you when you engage with us online or by email e.g. when you visit one of our websites, download articles/information from one of our websites, open or forward an email sent by us or engage with us on social media networks. Information may be collected via cookies and similar technologies, as detailed below. We may also take photos/film or CCTV images of you when you visit any of our church premises.

3. Information we receive from other sources

We may also collect information about you from reputable third parties (e.g. Co-Mission churches or third parties that we choose to use e.g. Eventbrite in relation to event bookings) that operate in accordance with UK data protection legislation or other public sources, if this is permitted by law.

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.

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.

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.

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.

The legal basis for processing personal data and how we use your information

We will process your data on one or more 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.

We may use your information for some or all 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;
- 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;
- to invite you to benefit from Co-Mission events, media or other ministries;
- to help you to support Co-Mission & church planting in London financially;
- 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 may have;
- 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 we will keep a record of this;
- 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 are used to prevent, deter and detect crime and to provide evidence in the courts);
- to monitor and assess the quality of our services;
- 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;

- where we otherwise consider such use of your information as not detrimental to you, within your reasonable expectations and necessary to fulfil our legitimate interests.

We will only use your information for the purpose it was collected (or for similar/related purposes). If we would like to use your personal data for an unrelated purpose we will request your consent in advance.

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 while it is in our care (see how below).

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 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.

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 CMIT employees/workers, church volunteers and church elders who need to know 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 termination if they fail to meet these obligations. Church volunteers who process personal information on our behalf are all expected to sign a Data Processing Agreement.

While we will use all reasonable efforts to safeguard your personal data you acknowledge that the use of the internet is not entirely secure and understand that we cannot guarantee the security or integrity of any personal data that is transferred from you or to you via the internet.

If you want 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.

Children’s information

We may collect and process personal data of children below the age of 13 (which is received from their parent/guardian) for the purposes of registering them for Sunday School, a children/youth club or an event.

If you learn that a child under 13 has provided us with personal information without consent, please contact us.

Data retention

We will retain your personal data for the period necessary to fulfil the purposes outlined in this privacy policy unless a longer retention period is required or permitted in relation to any legal, statutory or regulatory obligations.

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.

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 a small 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.
- 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.

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.

How to opt out of receiving marketing materials

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.

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 **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.

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 **privacy@co-mission.org**

Changes to our privacy policy

This policy is subject to change from time to time. Changes may be made when our practices change or when data privacy laws are updated. You should therefore check this policy regularly to ensure that you are aware of any changes.