

Privacy and Data Protection Policy for Attendees of Redeemer International Church Delft

Effective Date: 25 May 2018

INTRODUCTION

This document describes how Redeemer International Church Delft (henceforth: 'Redeemer') connects with you utilising contact information, such as email and telephone numbers, which you have previously provided to Redeemer for purposes of communication with the church.

This Privacy and Data Protection Policy outlines how Redeemer collects, uses, discloses, transfers, stores, retains or otherwise processes this information, whether provided through the website or acquired directly by any other means, and how Redeemer deals with this information in accordance with data protection law.

INTERPRETATION

Whenever "Redeemer", "We", "Our" or "Us" is used in this Policy, it refers to your relationship with, and an obligation or right in relation to, or on part of, Redeemer International Church Delft.

"Personal Data" is any information about a living individual which allows them to be identified, such as a name, email or photograph, and can identify them alone or in conjunction with other information.

“Data Controller” is the entity that determines the purpose for which personal data is collected and processed.

“Data Processor” is the entity processing personal data on behalf of the Data Controller.

DATA PROTECTION LAW

This policy explains how **we** comply with laws and regulations in the Netherlands: the Algemene Verordening Gegevensbescherming (**AVG**), the General Data Protection Regulation (**GDPR**) and the Privacy & Electronic Communications Regulations 2003 (“**the PECR**”) relating to electronic communications (jointly and severally, “**the Law**”).

Redeemer International Church Delft

- a. will manage content on that part of our website dedicated to registration for events and online giving;
- b. will deal with all Personal Data acquired from or relating to such persons accessing the website for any purpose including, without limitation:
 - i. making a donation;
 - ii. registering for any event;
 - iii. signing up to receive the newsletter;in accordance with this Policy and **the Law**;
- c. will keep such information confidential, adhering to the **Principles of Data Protection** as detailed in **GDPR**.

Your information will be:

- a. available to you at any time in ChurchSuite, to be updated and/or deleted from Redeemer’s database;

- b. processed lawfully, fairly and in a transparent manner;
- c. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- d. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- e. accurate and, where necessary, kept up to date;
- f. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed;
- g. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage using appropriate technical or organisational measures.

DATA CONTROLLERS and DATA PROCESSORS

If you provide Personal Data directly to Redeemer, through involvement at Redeemer, or to staff or volunteers, Redeemer International Church Delft is Data Controller and responsible to comply with its legal obligations under GDPR.

SCOPE OF THE POLICY

Redeemer International Church Delft takes your privacy seriously and has adopted this Policy as it recognises the right of people to keep their Personal Data private.

By providing Personal Data, including the use of ChurchSuite, you agree to allow us to contact you, including by mail, email, telephone, instant messaging or SMS text message, in connection with our charitable purposes:

- a. **for our legitimate interests**, in accordance with current data protection regulations; or
- b. **for our vital interest**, for the role you have in church; or
- c. **for our legal obligation**; or
- d. **on the basis of the consents you have given.**

Modifying Your Preferences

If at any point you would like to change your preferences and:

1. you do not wish to receive further communications from Redeemer; or
2. you wish to change the way you receive any communication

follow the procedure under **Your Rights** below.

If you disagree with any part of this Policy, please do not provide Personal Data to us and do not use ChurchSuite or any other service.

HOW PERSONAL DATA IS COLLECTED

Personal Data is collected each time you are in contact with us, for example, when you:

- a. visit the website (see the Cookies Policy);
- b. make a donation;
- c. register for an event;
- d. apply for a job or volunteer at Redeemer;

- e. provide your contact details, in writing or orally, to Redeemer staff or volunteers;
- f. participate in other Redeemer activities, e.g. Life Groups, serving teams;
- g. contact us by any means such as email, text, letter, telephone;
- h. have face-to-face meetings with staff or volunteers;
- i. access our page and resources on social media platforms such as Facebook, YouTube, WhatsApp, Twitter, Instagram;
- j. register with ChurchSuite (Redeemer's online church administration tool) and grant Redeemer access to your Personal Data and give consent to be contacted by us.

TYPES OF DATA COLLECTED

Personal Data

The types of Personal Data collected by us include:

- personal details such as your title(s), name(s) and date of birth;
- contact details such as postal address, post code, email, mobile and telephone numbers;
- when relevant to our mission, demographic information such as marital status, nationality, education, employment/qualifications and family details;
- financial information such as donation history and your bank details;
- spouse and family details when you jointly volunteer, register for events, and/or register your children for any reason at Redeemer;
- non-financial information such as proof of passports, driving licences and financial information such as salary records, tax codes and expenses claims (for employed staff and registered volunteers);

- employee and volunteer data such as qualifications, signed Child Protection Policies, languages and experience;
- records of your contact with us;
- photographs provided by you or taken at Redeemer services or events;

Sensitive/Special Category Personal Data

We may collect and store sensitive personal information (Special Category Information under GDPR) such as:

- health information provided during pastoral meetings;
- health information to assist attendance at Redeemer services and events;
- religious information (attendance at Redeemer events / activities, personal faith decisions, baptism);
- religious affiliation, permitted when you and/or your family attend, register for Redeemer events;
- prayer requests.

HOW WE USE YOUR DATA

We collect information about you for a variety of uses based on different reasons. For example, some information is disclosed in order to register for activities or events, sometimes we are required by law and regulations to collect and process information about you, and at other times we consider it is in our legitimate charitable interest to collect and process information.

Your Personal Data will be dealt with in accordance with **the Law**. It is never sold, nor given away. It is only shared with others where you have given consent or where it is permitted or required either contractually or legally.

We will not use your Personal Data for any other purpose without first seeking your consent, unless authorised or required by law.

Generally, uses of your Personal Data based on our legitimate charitable interests and on your consent may include:

- to keep you informed as to Redeemer services, activities, events, resources, and conferences;
- to manage employees and volunteers;
- to fundraise and process donations and related statutory rights and obligations;
- to establish and maintain your involvement with us, events you have attended, what areas and activities of Redeemer you have supported, record and acknowledge any donation, to provide the products or services you have requested;
- to answer an inquiry or request for further information or complaint about us, our services, activities and events;
- to register you for events, conferences and provide the services requested;
- to assist Redeemer to provide services more valuable to those involved in church;
- to improve our ability to assist Redeemer attendees and the wider community;
- to assist Redeemer with management and administrative purposes such as accounting, credit/debit card payments, anti-fraud measures, maintenance and development.

Legal Basis for Using Your Personal Data

We will only process your Personal Data where we have a legal basis to do so. The legal basis will depend on the reason or reasons we collected and need to use your information. Under **the Law** in almost all cases the legal basis will be:

- because it is in our legitimate interest as registered charitable and Christian religious entity to use your Personal Data to operate and improve our services as Redeemer;
- to fulfil any contractual relationship we have with you in relation to provision of products or services, such as registration at events;
- because you have consented to Redeemer using your information for a particular purpose;
- because we need to use your Personal Data to comply with a legal obligation, such as protection and welfare of individuals;
- to protect the vital interests of you or another person, for example, in pastoral situations;
- to process sensitive / special category Personal Data that is relevant to us as a not for profit religious organization;
- where you have given consent for us to contact you by mail, email, phone, instant message or SMS text message, to send you information and marketing communications.

DATA STORAGE AND WHO SEES YOUR DATA

Data you provide electronically, including through this website, may be held on computers in Redeemer locations and on servers in **the EEA**.

Information you provide in paper form, such as consents, letters or recorded in meetings with staff or volunteers, may be transferred to secure virtual systems or stored in secure physical filing systems.

Subject to compliance with our data management policies and procedures, and in compliance with the above data protection principles, information may be accessed, used and stored:

- a. on computers in Redeemer locations and servers based in the EEA; and
- b. by a limited number of staff or key volunteers under a duty of confidentiality who are involved in development, maintenance and operation of ChurchSuite or other platforms, or the services provided through them, or who act for us for the uses set out in this policy, or other purposes approved by you. Those parties may also process information, fulfil and deliver orders, process credit card payments and provide support services to us.

Third party service providers may process information, fulfil and deliver orders, process donations and credit card payments, and provide support services on our behalf. Where such details are shared, agreements in place restrict the use of your information to the purpose for which it is provided and ensure it is stored securely and in accordance with applicable data protection and privacy laws.

The main providers that we work with are;

1. The Rocket Science Group (for Mandrill & Mailchimp)
2. ChurchApp Ltd (for ChurchSuite)
3. Google Inc. (for Google Apps; Google Drive & GMail)

We do not sell or pass any of your personal information to any other organization and/or individuals without your express consent, unless required by law.

Financial Records and Card Details:

All financial payments and records are held in accordance with The Payment Card Industry Data Security Standard (“**PCI DSS**”).

All credit/debit card donations made online or by phone, are made securely through third party service providers and payment gateways, which comply with the **PCI DSS**. Unredacted card details are not recorded and stored on our systems.

We do not store unredacted financial details (credit or debit card numbers) obtained through online transactions nor do we pass any information to third parties, except where we are legally required to do so, to assist fraud reduction, or to provide a service requested and minimise credit risks.

HOW LONG WE RETAIN YOUR DATA

We will only keep your Personal Data for as long as it is required and in accordance with **the Law** and other legal requirements.

If you have indicated that you no longer wish to be contacted by us, we will keep the minimum information necessary to ensure that no future contact is made and delete your files within one (1) year.

However, even after you modify your communication preferences, we may retain copies of information about you for a period of time that is consistent with applicable law, applicable statute of limitations or as we believe is reasonably necessary to comply with applicable law, regulation, or legal process.

Where we hold Sensitive Category Personal Information, unless we have evidence of your regular contact with us or we are required by law to retain, the sensitive information will be deleted after a period of one (1) year.

COOKIES

Cookies are small text files which are stored on your computer when you visit certain web pages. At Redeemer we use cookies to understand how our site is used which helps us to improve your overall online experience. To find out more about cookies, visit www.aboutcookies.org.

YOUR RIGHTS

Personal Data

Where you have provided your consent to us processing your Personal Data, you may withdraw this consent at any time. In addition, the Law gives you the right, under certain circumstances:

- to request in writing and securely obtain copies of the Personal Data we hold about you;
- to correct or update your Personal Data held by us;
- to request us to stop using your Personal Data for marketing purposes or for any other purpose where there is no legal requirement for continued processing;
- to object to profiling activities based on our legitimate interest;
- to request to have all personal data deleted (in the EEA only). To exercise any of these rights please contact the Data Protection Contact (contact details set out below).

Please tell Redeemer as soon as any of your contact details change so that records can be kept up to date.

We will take reasonable steps to correct any of your Data, which is inaccurate, incomplete or out of date.

A request to access, amend or delete your Personal Data may be refused in certain circumstances. If refused, you will be provided with a reason for the decision and, in the case of amendment, will note with your Personal Data that its accuracy is disputed.

Marketing Communications

The **Privacy and Electronic Communications Regulations (PECR)**

gives you the right:

* to choose whether or not to receive marketing communication from us by email, text or telephone;

* to know about the cookies Redeemer uses, so that you can decide whether to give permission to store a cookie on your device.

You can change the way you are contacted, or the kind of material sent to you, at any time by contacting us by mail or e-mail using the contact details below.

Modifying Your Preferences

You will have the opportunity to decline to accept communications at any time and discontinue receiving such communication by:

- a. following the instructions to “unsubscribe” on any email or text communication received from Redeemer;
- b. emailing admin@redeemerdelft.nl;
- c. updating your preferences in MyChurchSuite, the user login from ChurchSuite.

DATA PROTECTION CONTACT

As per article 37, 38, 39 (& 9 lid 2d) of the AVG, no “Functionaris voor de gegevensbescherming” (Data Protection Officer) is needed: our Data Protection Contact will execute similar duties. Contact details set out below.

SECURITY

Reasonable steps will be taken to keep secure any Personal Data, which is held by Redeemer.

Personal Data, held electronically, is stored in a secure server or secure files.

The Internet is not a secure method of transmitting information.

Accordingly, no responsibility is accepted for the security of information you send to or receive from us over the Internet or for any unauthorised access or use of that information.

Security measures are taken to protect your information from access by unauthorised persons and against unlawful processing, accidental loss, destruction and damage.

Where we have given you, or where you have chosen security codes (username, password, memorable word or PIN), which enable you to use any online service, you are responsible for keeping these security details confidential.

LINKS AND SOCIAL MEDIA

Our website and services may also include links to other websites or may provide social media buttons, permitting sharing web content directly to a social media platform, such as Facebook, Twitter, WhatsApp and YouTube. We do not endorse social media website(s) and have no responsibility for the content unless posted by or approved by us nor are we responsible for the cookies such websites may contain.

Use of such buttons or links is at your own risk and you must verify authenticity of sites before posting or providing personal information on such sites.

We do not ask for passwords or personal details on social media.

Websites such as Vimeo and YouTube are used to embed videos on the website and service providers such as MailChimp and Google Analytics may send their own cookies via this site. Please look at the cookie and privacy policies on these third-party sites if you want more information about this.

DOWNLOADS

Any documents or files made available to download from our website are provided at users' own risk.

REPORTING CONCERNS

Please contact Redeemer if you wish to raise a concern about handling of your Personal Data through Redeemer if it involves information provided by other means.

You also have the right to lodge a complaint with the Data Protection Authority Office (see contact details below) about how your data is managed.

CHANGES TO THIS PRIVACY NOTICE

Redeemer International Church Delft may amend this Policy to reflect changes in best practice, security and control and to ensure compliance with any changes or amendments to the Law or other applicable legislation in the EEA. Any amended version will be available on the website. We suggest you visit regularly to keep up to date with any changes.

CONTACT

Contacting Redeemer International Church Delft:

If you would like any further information, or have any queries, problems or complaints relating to the Privacy Policy or our information handling practices in general, please contact the appropriate person/s below:

Redeemer International Church Delft

C. Fockstraat 98
2613 DH Delft

Data Protection Contact

Operations Manager: admin@redeemerdelft.nl

Data Protection Authorities

Autoriteit Persoonsgegevens: <https://autoriteitpersoonsgegevens.nl/>