



22 May 2018

North England Conference
of Seventh-day Adventists
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Personal Data Privacy Statement/Notice

What is the purpose of this Statement?

Personal Data is data which by itself or with other data can be used to identify you as an individual. It does not include data where the identity has been removed (anonymous data). There are “special categories” of more sensitive personal data which require a higher level of protection.

This statement sets out how we, the North England Conference of Seventh-day Adventists (“NEC”), as a data controller will use your personal data.

NEC is a “data controller”. This means that we are responsible for deciding how we hold and use personal information about you. We are required under the General Data Protection Regulation to notify you of the information contained in this privacy statement. This statement does not form part of any contract to provide service and it may be updated at any time.

It is important that you read this statement, together with any other privacy statement we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

You can contact the Data Protection Officer (“DPO”) for NEC at 22 Zulla Road, Nottingham, NG3 5DB or you can email at gdpr@necadventist.org.uk

DATA PROTECTION PRINCIPLES

We will comply with Data Protection Law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

DATA WE COLLECT ABOUT YOU

Who do we collect information about?

We have to process personal data in order to promote our organisation which includes Seventh-day Adventist Churches across the NEC. We also process data for the provision of services and to maintain our accounts and records. If you are, or if you are potentially, a member, visiting friend, parent/guardian of a child that is below the age of thirteen years old, supplier or service provider, advisor, consultant or professional advisor or any other stakeholder then we will process your personal data, to the extent necessary.

What types of Personal Data do we collect and use?

We may collect, store and use some or all of the following categories of personal information about you:

- Personal contact details, such as: title, name, addresses, telephone numbers and personal email addresses.
- Financial data: such as, details of bank accounts.
- Family, lifestyle or social circumstances, if relevant, to the product or service we supply to you.
- Record of products or services obtained or applied for
- Payment and compensation history.

We also collect, use and share aggregated data such as statistical or demographical data for any purpose. Aggregated data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We may also collect, store and use the following “special categories” of more sensitive personal information:

- Information about your health, including any medical condition, disabilities or vulnerabilities.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

How do we collect Personal Data?

We collect personal data that you correspond directly to us in relation to our organisation or services. We will also collect personal data about you from third parties who are essential to the goods or services we provide, for example British Union Conference. In addition, we may collect personal data from other publicly available sources.

How will we use your personal data?

We will only use your personal information when the law allows us to. Most commonly, we will use

your personal information in the following circumstances:

1. Where we need to perform the contract we have entered into with you.
2. Where we need to comply with a legal or regulatory obligation.
3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:

1. Where we need to protect your interests (or someone else's interests).
2. Where it is needed in the public interest or for official purposes.

We need all the categories of data listed above to fulfil our requirements. In some cases, we will use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests.

We have set out below in a table format, a description of the main ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Purpose / Activity	Type of Data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer, member and, visiting friend	<ul style="list-style-type: none"> • Identity • Contact 	Performance of a contract with you e.g. Tithes, Camp meeting, trips overseas
To process and deliver your order including: <ul style="list-style-type: none"> • Manage payments, fees and charges • Collect and recover money owed to us 	<ul style="list-style-type: none"> • Identity • Contact • Financial • Communications 	<ul style="list-style-type: none"> • Performance of a contract with you • Necessary for our legitimate interests (to recover outstanding monies due to us)
To manage our relationship with you which will include: <ul style="list-style-type: none"> • Notify you about changes to our terms or privacy policy • Asking you to leave a review or take a survey 	<ul style="list-style-type: none"> • Identity • Contact • Communications 	<ul style="list-style-type: none"> • Performance of a contract with you • Necessary to comply with a legal obligation • Necessary for our legitimate interest (to keep our records updated and to analyse data on the customers that use our services, to develop and grow our organisation/services)

To enable you to partake in a survey	<ul style="list-style-type: none"> • Identity • Contact • Usage • Communications 	<ul style="list-style-type: none"> • Performance of a contract with you • Necessary for our legitimate interest (to keep our records updated and to analyse data on the customers that use our services, to develop and grow our organisation/services)
To administer and protect our organisation and this website including troubleshooting, data analysis, testing, system maintenance, support, reporting or hosting data	<ul style="list-style-type: none"> • Identity • Contact • Technical 	<ul style="list-style-type: none"> • Necessary for our legitimate interest (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation) • Necessary to comply with a legal obligation

When will we use your personal data for another purpose?

We will only use your personal information 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 we need to use your personal information 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 information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

How will we monitor communications?

Subject to applicable laws, we may monitor and record: calls, emails, text messages, social media messages and other communications in relation to our dealings with you. We will do this for regulatory compliance, self-regulatory practices, crime prevention and detection. Also to protect the security of your communications systems, for quality control, staff training and when you need to see a record of what’s been said. All monitoring will be justified by our legitimate interests or our legal obligations.

DATA SHARING

We may have to share your data with third parties, including third-party service providers and other entities in our Seventh-day Adventist group such as the British Union Conference, Trans European Division, General Conference, Adventist Risk Management (ARM) and Stanborough Press. This includes also the local church, which you attend.

We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the EU. Where we do this, this will only be carried out with compliance of the EU Model Contract Clauses, which have been approved by the UK Data Protection Authority the Information Commissioner’s Office (“ICO”).

If we do, you can expect a similar degree of protection in respect of your personal information.

Why might you share my personal information with third parties?

We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

What third parties do we share information with?

For the reasons provided above we may share your data with the British Union Conference, Trans European Division, General Conference, Adventist Risk Management (ARM), Stanborough Press, ADRA UK, Citation, Anthony Collins, Chubb, PayPal, World Pay, Diversity Travel, Atlantic Data, Microsoft and any other Direct Service Provider contracted to carry our work on behalf of the NEC.

How do we protect the security of your information when we share it with third-parties?

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

DATA SECURITY

What measures have we put in place to secure your personal data?

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

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

DATA RETENTION

How long will you use my information for?

We will only retain your personal information 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. In addition to this we consider 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.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. All personal data will be kept in line with our Data Retention and Disposal Policy.

RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

What is your duty? Do you have to inform us of changes?

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

What are your rights in connection with personal information?

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information 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 information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have 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 for 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 information 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. You also have the right to object where we are processing your personal information 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 the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about in the following circumstances: (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 required it as you need it to establish, or 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 the transfer** of your personal information to another 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 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 consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw consent.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, withdraw consent to processing or request that we transfer a copy of your personal information to another party, please contact the DPO in writing.

Will we charge you for this?

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

Is there anything that the NEC may need from you?

We may need to request specific information from you to help us confirm your identity and ensure your rights as listed above, for example, the right for you to access the information we hold about you. This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

CONTENT & CHANGES TO THIS PRIVACY NOTICE

This website may include links to third party websites, plug-ins and applications. Clicking on those links or enabling that content may allow third parties to collect or share data about you. We do not control these third-party's websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

The NEC reserves the right to amend this Privacy Notice at any time and without prior notice.