



Sevenoaks Gospel Trust - Privacy Notice

Your privacy is important to us. This privacy notice provides information about the different types of personal information that we collect and the ways in which we use it, so please read it carefully. In order for us to ensure we comply with rules and regulation around data privacy, we need to make sure that we have considered all the ways in which we could use personal information, even though certain of these uses will only be in exceptional circumstances, or are where we have no current plans to use personal information in that way (for example, transferring data to subsidiaries). Please do contact us using the contact details set out at section 1 of this notice if you have any questions about this or any other aspect of this notice and how we use personal data.

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1. Who we are and how to contact us

Sevenoaks Gospel Trust (we/our/us) is a UK registered charitable company (registered with the Charity Commission with number 1179316 and at Companies House with company number 11371960). Under data protection law, we are what is known as a 'controller', which means that we collect and use personal information about individuals and determine ways in which that personal information is used.

Our purpose is to advance and support the evangelical Christian faith in the Sevenoaks area by providing grants, loans or other funding to, and by acquiring or renting property and making it available for use by, churches and Christian charities or groups that are in sympathy with our Statement of Faith (available on our website - <https://www.sevenoaksgospeltrust.org/>).

If you have any questions about how we use your personal information and how we comply with our responsibilities, please contact us as follows:

Email: sevenoaksgospeltrust@gmail.com

Write to us: Sevenoaks Gospel Trust, 10 Queen Street Place, London, EC4R 1BE

2. When do we collect personal information about you?

We may hold information relating to you from a number of sources and will collect personal information about you:

- a. When you give it to us **directly**
For example, personal information that you submit by contacting us (including via our giving form, through our website, if you provide us with details as part of a grant or sponsorship arrangement, and/or when making a donation) or any personal information that you share with us when you communicate with us in person (for example, when speaking with one of our Trustees about our work), by email, phone or post.
- b. When we obtain it **indirectly**

Your personal information may be shared with us by third parties, such as Stewardship who you can use to make gift aid eligible donations to us. To the extent that we have not done so already, we will notify you when we receive personal information about you from third parties, and tell you how and why we intend to use that personal information.

- c. When it is **publicly available**
Your personal information may be available to us from external publicly available sources. This may include information available on Companies House, Charity Commission and other charity registers, reputable media articles, publications and company websites and professional networking sites such as LinkedIn.

- d. When you visit our **website**

When you visit our website, we automatically collect:

- i. Technical information, including the IP address used to connect your device to the internet, browser type and version, time zone setting, browser plug-in types and versions and operating systems and platforms.
- ii. Information about your visit to the websites, including the uniform resource locator (URL) clickstream to, through and from the website (including date and time), services you viewed or searched for, page response times, download errors, length of visits to certain pages, referral sources, page interaction information (such as scrolling and clicks) and methods used to browse away from the page.

Our website may collect personal information from you by using cookies – please see our Cookie Notice on our website.

3. What personal information do we use?

We may collect, store and otherwise use the following kinds of personal information depending on how you interact with us:

- a. Your name and contact details, including email address, postal address and postcode, telephone number;
- b. Details of any donations you make to us, including financial information such as bank details and or credit/debit card details;
- c. Your communication preferences, such as whether you wish to receive updates about our work by email (we will separately seek your consent to send you such updates);
- d. Any other personal information which you choose to share with us e.g. in an email you send to us, when speaking to us or information provided in relation to a grant or sponsorship application;
- e. Details of your relationship or interactions with us (for example, any of our events you have attended);
- f. Information about your assets and estate if you choose to leave us a legacy;
- g. Information about your computer/ mobile device and your visits to and use of this website, including, for example, your IP address and geographical location; and
- h. Any other type of information shared with / obtained by us as listed in section 2 of this notice.

Special categories of data

Data protection law recognises certain categories of personal information as sensitive and therefore requiring more protection. These categories of data include information about your health, religious beliefs, ethnicity, and political opinions.

When you register your support for our work, this expresses your religious belief. We will use this data in the course of our legitimate activities and with appropriate safeguards in place as a non-profit with a religious aim. We do not otherwise seek to collect special category data. Where we do collect or use this type of personal information, we will only do so if there is a valid reason for doing so and where lawful. For example, we will usually seek your explicit consent to use such data.

4. How we use your personal information

Your personal information, however provided to us, will be used for the purposes specified in this Notice. In particular, we may use your personal information:

- a. to provide you with services or information that you have requested and respond to questions you have asked, such as if you make an enquiry on our website about how to make a donation to us;
- b. to communicate with you in general;
- c. to provide updates about our work, services, activities or publications (where necessary, and only where you have provided your consent to receive such information, such as when signing up to receive our email updates about our work);
- d. To ensure we are not contacting people who have told us not to;
- e. to request donations and support;
- f. to process your donations (which you can make directly to us or through Stewardship if your donation is eligible for gift aid and you would like the trust to collect gift aid – see <https://www.sevenoaksgospeltrust.org/support-us> or a brochure at the back of St Nicholas church) and carry out any related due diligence on donors;
- g. to receive and administer legacies, to communicate with you about any legacy you leave, and to evidence our entitlement to a legacy;
- h. to process and make decisions about grant/sponsorship and support applications
- i. to decide how to support and facilitate support to our beneficiaries
- j. to further our charitable aims in general, including for fundraising activities and asking for your support;
- k. to analyse, evaluate and improve our work, programmes, services, activities or information (including our website);
- l. to audit/administer our accounts;
- m. for the prevention of fraud or misuse of service; and
- n. for the establishment, defence or enforcement of legal claims.

5. Lawful processing

We are required to rely on one or more lawful grounds to collect and use the personal information that we have outlined above. We consider the grounds listed below to be relevant:

- a. Consent**
Where you have provided your consent for our use of your personal information in a certain way, for example, where we ask for your consent to send you updates about our work via email.
- b. Legal obligation**
Where the processing of your personal information is necessary for us to comply with a legal obligation to which we are subject, for example where we have to share your personal information with regulatory bodies which govern our work.
- c. Performance of a contract**
Where necessary for the performance of a contract to which you are a party or to take steps at your request prior to entering a contract (for example, if you apply to work for/ volunteer with us).
- d. Legitimate interests**
Where applicable law allows us to collect and use personal information for our legitimate interests, and the use of your personal information is fair, balanced and does not unduly impact your rights.

In broad terms our “legitimate interests” means the interests of running Sevenoaks Gospel Trust as a charitable entity and pursuing our charitable aim to advance the evangelical Christian faith as well as through administering donations and legacies and supporting our beneficiaries.

We may rely on this ground to process your personal information when we believe that it is more practical or appropriate than asking for your consent. For example, if you contact us to ask about how you can support the charity, such as how to make a donation, we will rely on the legitimate interest ground to communicate with you in most instances.

6. Do we share your personal information?

Apart from where set out in this Privacy Notice, we will not sell, rent or lease your personal information to others. We do not share your personal information with third parties for marketing purposes.

As you may anticipate, we will share personal information we hold about you with our officers, staff or volunteers (if any), in connection with our work and services.

We may also disclose your personal information to selected third party processors (such as agents or sub-contractors) for the purposes outlined at section 4. The third party in question will be required to use any personal data they receive in accordance with our instructions.

Non-exhaustively, those third parties may include:

- (a) Members of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the Companies Act 2006;
- (b) Suppliers and sub-contractors for the performance of any contract we enter into with them, for example IT service providers such as website hosts, cloud storage providers or email clients such as gmail;
- (c) Financial providers and giving providers (such as Stewardship, who will provide us with your name and may provide us with other personal information if you provide your consent for them to do so), in relation to donations you make to us;
- (d) Professional service providers such as accountant and lawyers;
- (e) Insurers;
- (f) Regulatory authorities, such as Her Majesty’s Revenue and Customs.

In particular, we reserve the right to disclose your personal information to third parties:

- (g) in the event that we buy or sell any business or assets, in which case we will disclose your personal information to the prospective buyer or seller or such business or assets;
- (h) if substantially all of our assets are acquired by a third party, personal information held by us may be one of the transferred assets;
- (i) with our professional advisors e.g. lawyers, where necessary to protect our interests;
- (j) if we are under any legal or regulatory obligation to do so; and
- (k) in connection with any legal proceedings or prospective legal proceedings, in order to establish, exercise or defend our legal rights.

7. International Data Transfers

As we sometimes use third parties to process personal information, it is possible that personal information we collect from you will be transferred to and stored in a location outside the UK or the European Economic Area (**EEA**).

Please note that certain countries outside of the UK or EEA have a lower standard of protection for personal information, including lower security protections. Where your personal information is transferred, stored, and/ or otherwise processed outside the UK or EEA in a country which does not offer an equivalent standard of protection to the UK or EEA, we will take all reasonable steps necessary to ensure that the recipient implements appropriate safeguards designed to protect your personal information. For instance we may use cloud providers to store personal information who have servers in the US and are signed up to the Privacy Shield. If you have any questions about the transfer of your personal information, please contact us using the details at section 1.

8. Securing your personal information

We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information. We restrict access to those who have a need to know and we train staff in handling the information securely. We will store all the personal information you provide on secure servers.

9. How long do we keep your personal information?

Unless still required in connection with the purpose for which it was collected and/or processed, we will generally remove your personal information from our records seven years after the date that it was collected. However, before this date: (i) if your personal information is no longer required in connection with such purpose(s); (ii) we are no longer lawfully entitled to process it; or (iii) you validly exercise one of your rights of erasure (referred to at section 10), we will remove it from our records. If you leave a legacy to us, we will retain your personal information in connection with the legacy for as long as is necessary to process your legacy instructions.

10. Your rights and preferences

We explain how you can update your communication preferences above. Where we rely on your consent, you have the right to withdraw your consent at any time.

When we use your personal information you have the right to:

- a. Ask us for **confirmation** of what personal information we hold about you, and to request **access** to a copy of that information. If we are satisfied that you have a right to see this personal information, and we are able to confirm your identity, we will provide you with this personal information.
- b. Request that we **delete** the personal information we hold about you, as far as we are legally required to do so.
- c. Ask that we **correct** any personal information that we hold about you which you believe to be inaccurate.
- d. **Object** to the processing of your personal information where we: (i) process on the basis of the legitimate interests ground; (ii) use the personal information for direct marketing; or (iii) use the personal information for statistical purposes.
- e. Ask for the **provision** of your personal information in a machine-readable format to either yourself or a third party, provided that the personal information in question has been provided to us by you, and is being processed by us: (i) in reliance on your consent; or (ii) because it is necessary for the performance of a contract to which you are party; and in either instance, we are processing it using automated means.

- f. Ask for processing of your personal information to be **restricted** if there is disagreement about its accuracy or legitimate usage.

If you decide you do not want to receive any further communications from us, please tell us.

Please note that where you ask us to remove your personal information for marketing purposes we will maintain a skeleton record comprising your name and contact details to ensure that we do not inadvertently contact you in the future. We may also need to retain some financial records for statutory purposes, for example Gift Aid.

You also have the right to lodge a complaint with the Information Commissioner's Office at www.ico.org.uk/concerns.

11. Other websites

We are not responsible for the privacy practices or the content of linked web sites. Please review the privacy notices of such websites.

12. Updating this privacy notice

We may update this privacy notice by posting a new version on this website. If we update this privacy notice in a way that significantly changes how we use your personal information, we will bring these changes to your attention. Otherwise, we would recommend that you periodically review this privacy notice to be aware of any other revisions.

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Dated: January 2019