

SOAR	<b>GDPR Policy</b>	Version: 1.0 Date: 20 September 2021
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# SOAR Project

Registered charity 1068361

# GDPR Policy

Date adopted	20 September 2021
Review periodicity	2 years
Next review	September 2023

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This is the privacy statement and data protection policy for The SOaR project and Charity No 1068361. It covers how we will process (use and store) your data, what data we hold, your individual rights and how you can interact with us about your data. As with all policy statements, it is a bit wordy! But don't let this put you off, and if you need to you are welcome to get in touch with our Data Protection Lead, Keith Munro. We are here to help!

This policy covers our use of Personal data, which is any information about a living individual which allows them to be identified from that data (for example a name, photographs, videos, email address, or address). This may be you! Identification can be by the information alone or in conjunction with any other information.

Our processing of personal data is governed by the Data Protection Bill/Act 2017-2019 and the General Data Protection Regulation 2016/679 (the "GDPR" and other legislation relating to personal data and rights such as the Human Rights Act 1998].

Who are we? This Privacy Notice is provided to you by The SOaR project and Charity No 1068361 which is the Data Controller for your data. SOaR has appointed a number of responsible people for the control and processing of personal data that we hold. These post-holders have been trained in GDPR requirements and a list of the individuals can be inspected at the Office by request. For clarity, the term Data Controller covers all employed staff members, office holders and trustees for SOaR.

## **1. So, how is your data used and processed?**

SOaR processes data containing:

- a) names, titles, and aliases, photographs;
- b) Contact information including telephone numbers, postal /residential addresses, and email addresses;
- c) Where there is a legitimate interest to facilitate our charitable aims and activities, or where you have provided them to us, we may process demographic information such as gender, age, date of birth, marital status, nationality, education/work histories, academic/professional qualifications, hobbies, family composition, and dependants;
- d) Where you give financially in support of SOaR or pay for activities (event bookings etc.), financial identifiers such as bank account numbers, payment card numbers, payment/transaction identifiers, policy numbers, and claim numbers;
- e) As SOaR (religious organisation), the data we process is likely to constitute sensitive personal data because the very fact that we process your data at all may be suggestive of your religious beliefs. Where you provide this information, we may also process other categories of sensitive personal data: racial or ethnic origin, sex life, mental and physical health, details of injuries, medication/treatment received, political beliefs, data concerning sexual orientation and criminal records, fines and other similar judicial records.

As a Data Controller, all our appointed persons will comply with their 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 keep personal data secure, and to protect personal data from loss, misuse, unauthorised access and disclosure and to ensure that appropriate

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technical measures are in place to protect personal data. If you have any concerns about how your data is being used, please speak with our Data Protection Lead: Keith Munro.

## **2. What are we doing with your data?**

We only hold data that either we are legally obliged to or that helps us fulfil our missional and charitable aims as SOaR.

Therefore, we will hold and process data to:

- a) enable us to meet all legal and statutory obligations
- b) Comply with and facilitate our comprehensive safeguarding procedures (including due diligence and complaints handling) 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 (please see our safeguarding procedure);
- c) Help you grow as a disciple and to minister to you and provide you with pastoral and spiritual care (such as visiting you when you are gravely ill or bereaved)
- d) Deliver SOaR's mission to our community, and to carry out any other voluntary or charitable activities for the benefit of the public as provided for in the constitution and statutory framework of our charitable organisation;
- e) Enable us to follow up course and event enquiries
- f) Fundraise and promote the interests of SOaR;
- g) Maintain our own accounts and records;
- h) Process and record financial donations that you have made (including Gift Aid information);
- i) Communicate with you about your views or comments;
- j) Update you about changes to events, and any matters of interest related to SOaR
- k) Send you communications which you have requested and that may be of interest to you. These may include information about campaigns, appeals, other fundraising activities;
- l) Process a grant or application for a role;
- m) Enable us to provide a voluntary service for the benefit of the public in a particular geographical area as specified in our constitution;

## **3. What is our legal basis for processing your personal data?**

- a) Most of our data is processed because it is necessary for our legitimate interests to enable our charitable and missional aims. For example safeguarding our children, recording our financial donations and operating team rotas for the effective function of SOaR events.
- b) Some of our processing is necessary for compliance with a legal obligation. Retaining safeguarding records and gift aid declarations are examples of this. We may also process data if it is necessary for the performance of a contract with you, or to provide a direct service to you. For example, if you buy tickets for an event.
- c) As a religious organisation, we are permitted to process information about your religious beliefs to administer contact details.

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- d) Where your information is used other than in accordance with one of these legal bases, we will first obtain your consent to that use.

#### 4. Will we share your data?

- a) You can be reassured that we will treat your personal data as strictly confidential. It will only be shared with third parties where it is necessary for the performance of our tasks or where you first give us your prior consent. It is likely that we will need to share your data with some or all of the following (but only where necessary):
- i. Our agents, servants and contractors. For example, we utilise commercial providers to send out newsletters on our behalf, and to maintain our database software;
  - ii. On occasion, churches with which we are carrying out joint events or activities.

#### 5. How long will we keep your personal data?

- a) Our general rule is to keep data no longer than necessary. Where you continue to actively engage with our activities and events, we will retain the appropriate data for you so that we can best serve your involvement. We operate to an annual process of review, by which we assess who is actively engaging in our activities, and where this is not the case we will remove your data. Additionally;
- i. We will keep some records permanently if we are legally required to do so. For example this covers some safeguarding records.
  - ii. We may keep some other records for an extended period of time. For example, it is current best practice to keep financial records for a minimum period of 7 years to support HMRC audits.

#### 6. What are your rights in regards to your personal data?

You have the following rights with respect to your personal data: When exercising any of the rights listed below, in order to process your request, we may need to verify your identity for your security. In such cases we will need you to respond with proof of your identity before you can exercise these rights.

- a) **The right to access information we hold on you.** At any point you can contact us to request the information we hold on you as well as why we have that information, who has access to the information and where we obtained the information from. Once we have received your request we will respond within one month. There are no fees or charges for the first request but additional requests for the same data may be subject to an administrative fee .
- b) **The right to correct and update the information we hold on you.** If the data we hold on you is out of date, incomplete or incorrect, you can inform us and your data will be updated.
- c) **The right to have your information erased.** If you feel that we should no longer be using your data or that we are illegally using your data, you can request that we erase the data we hold. When we receive your request we will confirm

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- whether the data has been deleted or the reason why it cannot be deleted (for example because we need it for our legitimate interests or regulatory purpose(s)).
- d) **The right to object to processing of your data.** You have the right to request that we stop processing your data. Upon receiving the request we will contact you and let you know if we are able to comply or if we have legitimate grounds to continue to process your data. Even after you exercise your right to object, we may continue to hold your data to comply with your other rights or to bring or defend legal claims.
  - e) **The right to data portability.** You have the right to request that we transfer some of your data to another controller. We will comply with your request, where it is feasible to do so, within one month of receiving your request.
  - f) **The right to withdraw your consent to the processing at any time for any processing of data to which consent was sought.** You can withdraw your consent easily by telephone, email, or by post (see Contact Details below).
  - g) The right to lodge a complaint with the Information Commissioner's Office. You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF.

## 7. Transfer of Data Abroad

Any electronic personal data transferred to countries or territories outside the EU will only be placed on systems complying with measures giving equivalent protection of personal rights either through international agreements or contracts approved by the European Union. Our website is also accessible from overseas so on occasion some personal data (for example in a newsletter) may be accessed from overseas, however it is our general practice not to publish any personal data on our website or in our printed newsheets.

## 8. Further processing

If we wish to use your personal data for a new purpose, not covered by this Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

## 9. You are very welcome to get in contact with us...

If you have any queries or concerns about how we use your data, please do get in contact with us.

Address: **SOaR Project, 5 Howard Close, Loughborough, Leics. LE11 4TL**

Email: **office@soarproject.org.uk**

Tel: **01509 238850**