

Anglican International Development Data Privacy Notice

1. Definitions

- a. **Personal data** is information about a living individual which is capable of identifying that individual. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession.
- b. **Processing** is anything done with/to personal data, including storing it.
- c. The **data subject** is the person about whom personal data are processed.
- d. The **data controller** is the person or organisation who determines the how and what of data processing.
- e. the **GDPR** is the General Data Protection Regulation 2016/679 which governs the processing of personal data.

2. Who are we?

Anglican International Development (AID) (contact details below) is the data controller, i.e. we decide how your data is used. The ways in which we use your data are outlined in this Privacy Notice.

What data do the controllers listed above process? They will process some or all of the following where necessary to perform their tasks:

- a. Names, titles, and aliases, photographs;
- b. Contact details such as telephone numbers, addresses, and email addresses;
- c. Where they are relevant to our mission, or where you provide 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 make donations or pay to attend an event, financial identifiers such as bank account numbers, payment card numbers, payment/transaction identifiers, policy numbers, and claim numbers;
- e. The data we process is likely to constitute special category data because, as an organisation with a Christian aim, the fact that we process your data at all may be suggestive of your religious beliefs.

3. How do we collect and process your personal data?

- a. AID collects your personal data directly from you when you sign up to a mailing list at an event or online, make a donation or offer to volunteer with, or fundraise for, us.
- b. AID complies with its obligations under the GDPR by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.
- c. We use your personal data for the following purposes: -
 - i. To build up a picture of our supporter profile;
 - ii. To keep you up to date with news of projects, events, activities and other information
 - iii. To fundraise and promote the interests of AID;
 - iv. To process a donation that you have made (including Gift Aid information);
 - v. To manage our employees and volunteers;
 - vi. To maintain our own accounts and records
 - vii. To process a grant or application for a role;

4. What is the legal basis for processing your personal data?

AID relies on the following legal bases for processing personal data:

- a. **Under Article 6 of the GDPR**
 - i. *Consent of the data subject.*

- ii. *Processing is necessary for the legitimate interests of the data controller or a third party, except where such interests are overridden by the interests, rights or freedoms of the data subject* – AID will rely on this basis to:
 - A. Send thank you letters in response to donations made to us;
 - B. Record donation details on our database;
 - C. Send information about how a donation has been used for up to one year after the donation was made by the data subject
 - D. Make Gift Aid claims;
 - E. Continue to communicate with data subjects already on our database, from whom we have not yet received consent for up to one year after the GDPR comes into force to give those data subjects the opportunity to complete a consent form if they would like to do so.

b. Under Article 9 of the GDPR

- i. *Explicit consent of the data subject.*
- ii. *Processing is carried out by a not-for-profit body with a political, philosophical, religious or trade union aim provided:*
 - o *the processing relates only to members or former members (or those who have regular contact with it in connection with those purposes); and*
 - o *there is no disclosure to a third party without consent.*

4. Sharing your personal data

Your personal data will be treated as strictly confidential. It will only be shared with third parties where it is necessary for the performance of our tasks, where we are legally required to share your personal data, where we share your personal data to protect AID or another individual, or where you first give us your prior consent. It is likely that we will need to share your personal data with some or all of the following (but only where necessary):

- Our agents, servants and contractors. For example, we may ask a commercial provider to maintain our database software e.g. Sheep or we may send out emails via MailChimp. You can find their Privacy Notices on their websites.

5. How long do we keep your personal data?

In general, we will endeavour to keep personal data only for as long as we need it. This means that we may delete it when it is no longer needed.

- a. We will **retain** the personal data of a data subject on our database whilst the data subject remains an active supporter of AID as demonstrated by any of the following:
 - i. opening electronic communications;
 - ii. making a donation;
 - iii. responding to social media posts;
 - iv. volunteering or fundraising for AID;
 - v. in any other way demonstrating their active support for AID.
- b. We will **delete** from our database the personal data of a data subject where the data subject is no longer an active supporter of AID (as demonstrated above) in which case the personal data will be deleted after 5 years have elapsed from the last occasion on which the data subject demonstrated active support for AID.
- c. We will retain **Gift Aid declarations** and associated paperwork until 6 years after the end of the accounting period during which the most recent donation was made by the data subject.

6. Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data: -

- a. The right to request a copy of your personal data which AID holds about you;

- b. The right to request that AID corrects any personal data if it is found to be inaccurate or out of date;
- c. The right to request your personal data is erased where it is no longer necessary for AID to retain such data;
- d. The right to withdraw your consent to the processing at any time;
- e. The right to request that AID provides you with your personal data and, where possible, transmits that data directly to another data controller, (known as the right to data portability), (where applicable);
- f. The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- g. The right to object to the processing of personal data, (where applicable);
- h. The right to lodge a complaint with the Information Commissioners Office.

7. Further processing

If we wish to use your personal data for a new purpose, not covered by this Privacy 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.

Changes to this notice

We keep this Privacy Notice under regular review and we will place any updates on our website. If we make a significant change, we will notify you. This Notice was last updated in May 2018.

8. Contact Details

- a. To exercise all relevant rights, queries or complaints please in the first instance contact our administrator, Alice Lane: alice.lane@interanglicanaid.org 0191 212 5134 or info@interanglicanaid.org.
- b. You can contact the Information Commissioner's 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.

9. Use of Cookies

A cookie consists of information sent by a web server to a web browser, and stored by the browser. The information is then sent back to the server each time the browser requests a page from the server. This enables the web server to identify and track the web browser. We may use "session" cookies on the website. We will use the session cookies to: keep track of you whilst you navigate the website. Session cookies will be deleted from your computer when you close your browser. We use Google Analytics to analyse the use of this website. Google Analytics generates statistical and other information about website use by means of cookies, which are stored on users' computers. The information generated relating to our website is used to create reports about the use of the website. Google will store this information. Google's privacy policy is available at: <http://www.google.com/privacypolicy.html>. Most browsers allow you to reject all cookies, whilst some browsers allow you to reject just third party cookies. For example, in Internet Explorer you can refuse all cookies by clicking "Tools", "Internet Options", "Privacy", and selecting "Block all cookies" using the sliding selector. Blocking all cookies will, however, have a negative impact upon the usability of many websites.