

# Privacy Policy



This Privacy Policy applies to information we “the267project” (charity number 1122830) collect and process about individuals who interact with our charity. It explains what personal data we collect and how we use it, following the principles of General Data Protection Regulation (GDPR) brought into force by the Data Protection Act 2018.

Personal data is information which relates to an identified or identifiable living individual.

You can find further information about the Data Protection Act and GDPR by visiting the Information Commissioner’s Office website at <https://ioc.org.uk/>

If you have any comments or questions about this Privacy Policy, feel free to contact us at [pa@the267project.com](mailto:pa@the267project.com)

# 1. Personal data that we process

The following table explains the types of data we collect and the legal basis, under current data protection legislation, on which this data is processed.

<b>Action</b>	<b>Data (key elements) collected</b>	<b>Our Legal Basis for collecting, processing and storing that data</b>
Enquiring about "the267project" and its work	Name, email, message	Legitimate interests - it is necessary for us to read and store your message so that we can respond in the way that you would expect
Subscribing to email updates from "the267project"	Name, email address, postal address; category of subscriber (e.g. donor, supporter)	Consent – you have given your consent through the sign-up form. Consent can be withdrawn at any time using the "Unsubscribe" button
Filling in a Google booking form about a child/young person for an event or residential activity	Child's/young person's name & age; medical information including allergies or additional needs; parent's/carer's name, email, contact number; 2nd emergency contact number; name of associated church/youth group	Vital interests – this information is necessary to safeguard the wellbeing of the child/young person whilst in the care of "the267project"
Filling in a Google booking form for an event as a participating adult	Name, email, contact number; medical information including allergies or additional needs	Vital interests – this information is necessary to safeguard the wellbeing of the adult whilst attending an event run by "the267project"

Filling in a Google booking form for an event or residential activity as a leader	Name, email, contact number; emergency contact number; medical information including allergies or additional needs information; DBS number & date issued, date of last safeguarding training	Vital interests – this information is necessary to safeguard the wellbeing of the adult as well as the wellbeing of the children/young people under the supervision of that adult whilst at the event or residential activity
Making a donation to “the267project” through a third party data processor such as Golden Giving, Stewardship, Giveall2Charity	Name, email, address; payment information	Legitimate interests - this information is necessary for us to fulfil your intention of donating money and your expectation of receiving a confirmation message; it also allows for accurate recording of and accounting for our income.
Making a donation or payment to “the267project” bank account	Name, payment amount	Legitimate interests – this information is necessary for “the267project” to accurately record and account for its income
Setting up a standing order to make regular donations to “the267project”	Name, payment amount, bank account details for initial set-up, after which they are deleted	Legitimate interests – this information is necessary for us to fulfil your intention of donating money to “the267project”; it also allows for accurate recording of and accounting for our income
Providing a Gift Aid declaration	Name, address, signature, tax status	Legal obligation – this information is necessary to comply with the HMRC regulations for Gift Aid
Signing up as a Church Partner at Gold, Silver or Bronze level	Name or church; email, signature of church representative; payment amount	Contract - by paying your membership fees you have entered a contractual relationship with us as set out in our membership terms and conditions
Entering a contract with “the267project” for services/products	Name/s, email; bank details of the service provider	Contract – this information is necessary for us to fulfil a contractual relationship, such as making a payment

provided by you		for services/products provided by you
Disclosing possible safeguarding concerns	Name, age, date of birth, address of person concerned about; parent/carer email and/or phone number; name & contact number of recorder; names of witnesses	Vital interests – this information is necessary to comply with our Safeguarding Policy (details on our website <a href="http://www.the267project.com">www.the267project.com</a> )
Giving permission for the taking of photographs or making videos or podcasts at 267 events	Photograph, video clip or podcast identifying image or voice of individual	Consent - permission has been granted on the google booking form or in person
Providing personal information as a trustee	Name , email, contact number	Legitimate interests – this information is necessary for us to communicate with you in terms of charity governance
Providing personal information as an employee	Name, email, contact number, address, date of birth; NI number; P45 data; employment history; medical or additional needs; bank details for salary payments	Contract – by signing employment contract, you have entered a contractual relationship with us, with legal and financial processes reliant on the processing of the data provided

## 2. How we use your data

We will only use your data in a manner that is appropriate considering the basis on which that data was collected, as set out in the table at the top of this policy.

For example, we may use your personal information to:

- reply to enquiries you send to us;
- handle donations or other transactions that you initiate;
- where you have specifically agreed to this, send you communications by email relating to our work which we think may be of interest to you;

- provide appropriate care for you or your child when attending an event or residential;
- meet legal requirements (such as in reclaiming tax through Gift Aid or recording safeguarding concerns)
- meet financial costs for services provided to “the267project”

### 3. When we share your data

We will only pass your data to third parties in the following circumstances:

- you have provided your explicit consent for us to pass data to a named third party;
- we are using a third party purely for the purposes of processing data on our behalf and we have in place a data processing agreement with that third party that fulfils our legal obligations in relation to the use of third party data processors.
- we are required by law to share your data.

In addition, we will only pass data to third parties outside of the EU where appropriate safeguards are in place as defined by Article 46 of the General Data Protection Regulation.

### 4. How long we keep your data

We take the principles of data minimisation and removal seriously and have internal policies in place<sup>i</sup> to ensure that we only ever ask for the minimum amount of data for the associated purpose and delete/destroy that data promptly once it is no longer required.

Data relating to the disclosure of a Safeguarding issue will be kept and passed securely to the Designated Safeguarding Lead who will follow the procedures outlined in our Safeguarding Policy.

Where data is collected on the basis of consent, we will seek renewal of consent at least every three years.

### 5. Rights you have over your data

You have a range of rights over your data, which include the following:

- Where data processing is based on consent, you may revoke this consent at any time and we will make it as easy as possible for you to do this (for example by putting ‘unsubscribe’ links at the bottom of all our marketing emails).
- You have the right to ask for rectification and/or deletion of your information. (Exceptions apply<sup>ii</sup>.)
- You have the right of access to your information.
- You have the right to lodge a complaint with the Information Commissioner if you feel your rights have been infringed.

A full summary of your legal rights over your data can be found on the Information Commissioner’s website [here](#).

If you would like to access the rights listed above, or any other legal rights you have over your data under current legislation, please get in touch with us at [pa@the267project.com](mailto:pa@the267project.com)

Please note that relying on some of these rights, such as the right to deleting your data, will make it impossible for us to continue to deliver some services to you. However, where possible we will always try to allow the maximum access to your rights while continuing to deliver as many services to you as possible.

## 6. Modifications

We may modify this Privacy Policy from time to time and will publish the most current version on our website [www.the267project.com](http://www.the267project.com). We will notify you of any changes.

January 2020

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<sup>i</sup> Data Protection Policy; Data Archiving Policy and Register of Data Systems

<sup>ii</sup> Exceptions apply where data collected and processed relates to a Safeguarding concern. This data must be kept and processed in line with our Safeguarding Policy procedures.