

PRIVACY POLICY

Holywood Baptist is committed to protecting your personal information and being transparent about what information we hold about you, whether you are a **visitor** to our websites, a **subscriber** to our publications, a **financial supporter**, a **volunteer** or **participant** in one of our programmes or events, or a **prayer supporter**.

This policy explains how we collect and use the personal information you provide to us, whether this is online, in person or via phone, mobile, email, letter or other correspondence or printed form, and personal information about you that we may obtain from third parties.

If you use our websites or any of our services, or provide us with any personal information, we will bring this policy to your attention so that you are fully aware of how your information will be used and disclosed.

Additional Privacy Notice: CORONAVIRUS COVID-19

This temporary addition to Holywood Baptist Church's Privacy Notice (September 2020) is to make it easier to understand and provide you with more information about how we may seek to collect and hold information about you in relation to the unprecedented challenges we are all facing during the Coronavirus pandemic (COVID-19).

What personal data is being collected?

To support the Contact Tracing Service (which operated by the Public Health Agency in Northern Ireland) Holywood Baptist Church has decided to collect and keep a limited record of staff, members and visitors who attend events at the Church for the purposes of contact tracing.

As a member/visitor of Holywood Baptist Church you will be asked to provide some basic information and contact details.

The following information will be collected:

- The names of each member or visitor, or if it is a group of people, the name of one member of the group.
- A contact phone number and email address for each member or visitor, or for the lead member of a group of people.
- Date of visit and time of service/event.

In addition, the names of all Leaders, Deacons & Stewards on duty during your visit will be recorded alongside your information.

We will require you to register through our website to attend each event or to complete a form on arrival

What is our lawful basis for processing your personal data?

The use of your information is covered by the General Data Protection Regulations Article 6 (1) (f) – legitimate interests of the venue/establishment. The legitimate interest in this case is the interest of Holywood Baptist Church in co-operating with the Contact Tracing Service in order to help maintain a safe operating environment and to help fight any local outbreak of coronavirus.

Am I required to provide my personal data under a statutory or contractual requirement, or am I obliged to provide it?

Whilst the provision of data cannot be mandated, you are strongly advised that it is in the best interests of all to provide this information if requested.

We will only share information with the Contact Tracing Service if it is specifically requested by them. For example, if another member/visitor at the event reported symptoms and subsequently tested positive, the Contact Tracing Service can request the log of member/visitor details for a particular time period (e.g.: this may be all members/visitors who visited on a particular day or event, or over a two-day period). The Contact Tracing Service will not disclose this information to any third party unless required to do so by law (e.g. as a result of receiving a court order).

How long will my personal data be retained?

We will only keep your information for 21 days from the date of your visit, to enable contact tracing to be carried during that period, taking into account Government advice and the on-going risk presented by Coronavirus.

Information provided by individuals attending any Church event in relation to this outbreak of Coronavirus will not be used for any other purpose. When the information is no longer needed for this purpose, it will be securely destroyed.

Your data and rights

Your information will always be stored and used in compliance with data protection legislation.

If you do not wish your contact information to be passed to the Contact Tracing Service if it is requested, please speak to a Deacon on duty at the time of your visit.

By law, you have a number of rights as a data subject, such as the right to access information held about you. If you are unhappy or wish to complain about how your information is used, you should contact: DPO@health-ni.gov.uk in the first instance to resolve your issue.

If you are still not satisfied, you can complain to the Information Commissioner's Office. Their website address is www.ico.org.uk

Our privacy policy in brief

It's important that you read the full policy to understand **what information we hold, how we may use it, and what your rights are** - but if you don't have time to read it all now, here's a quick summary:

- We collect information that is **personal data**. Personal data is information that can be used to help identify an individual, such as name, address, phone number, email address, IP addresses or website pages accessed.
- We collect information about everyone who engages with HBC. This could be supporters, subscribers, customers, those who participate in our programmes or events, donors, volunteers, employees, office-bearers or trustees.
- We collect information to provide services or goods, to provide information, to fundraise for our work, to resource our activities and fulfil our charitable objectives and for administration. This information may also be used for research analysis, and for the prevention or detection of crime.
- We only collect the information that we need or that you agree we can collect.
- We do our best to keep personal information secure wherever we collect personal data online.
- We never sell your data and we will never share it with another company or charity for their own purposes.
- We only share data where we are required by law or with carefully selected service providers who carry out work for us. We recognise the importance of ensuring that all our service providers treat your data as carefully as we would, use it only as instructed, and allow us to check that they do this.
- Our websites use cookies. For more information, please check our [Cookie Policy](#).

These are the key points of the privacy policy. You will find the policy in full below, so you've got all the details you need.

This policy applies to all the **websites** we operate, our use of emails and postal mailings for marketing purposes, and any other methods we use for collecting information. **It covers what we collect and why, what we do with the information, what we won't do with the information, and what rights you have.**

Who are we?

Hollywood Baptist Church (HBC) is a group of followers of Jesus from Hollywood and the surrounding area. Our church family consists of people from a wide range of ages and backgrounds. We want to bring glory to God, to help one another grow in our Christian faith, to reach out in God's love to those in Hollywood and beyond and ultimately to see many from all backgrounds become fully devoted followers of Jesus. HBC is a UK charity registration number is XN73440.

HBC is registered with the Information Commissioner's Office (ICO) as a data controller, registration number Z3140744. You can find out [more about our registration here](#), including a list of all data related activities that we have registered with the ICO.

Hollywood Baptist Church's registered address is 67 Belfast Road, Hollywood, Co Down BT18 9ES.

For further information about our privacy policy and data protection, please contact us by:

- emailing info@hollywoodbaptist.org.uk
- writing to our Data Protection team at HBC's registered address
- calling us on **028 9042 1519**

What information do we collect? Where do we collect it from?

We will only ever collect the information we need - including data to help improve our services – or which you agree we can collect.

Personal data is any information that can be used to identify you. For example, it can include information such as your name, email address, postal address, telephone number, mobile telephone number, bank account details, credit/debit card details, and whether you are a taxpayer so that we can claim Gift Aid on any donations you may make. It also includes Internet Protocol (IP) addresses (the location of the computer on the internet), details of pages visited on our websites and files downloaded.

We collect information in the following ways:

Information that you give us directly

We collect this information in connection with specific activities, for example, when you use our websites or printed forms or telephone our offices to:

- make a donation to us
- register for an event
- register for our church directory
- create an account on one of our websites
- engage with our social media
- sign up for our email newsletters
- complete a survey, questionnaire or feedback form
- or otherwise provide us with personal information.

Please note: You don't have to disclose any of this information to browse our websites. However, if you choose to withhold requested information, we may not be able to provide you with certain services.

Information that we collect from your use of our websites

We collect information on our users through registration. Website usage information is collected using **cookies**. This helps us to see how many people use our websites, how many people visit on a regular basis, and how popular individual pages are. Cookies are also essential to our websites running correctly and delivering goods and services to users. For more information please see our [cookies policy](#).

Information from third parties

We may receive information about you from third parties, for example from a friend who wants to send you a gift or information, book an event or make a donation in your name.

Sensitive/special categories of data

The Data Protection Act 2018 recognises that certain categories of personal information are more sensitive. This is known as **sensitive personal data** or **special categories** of data and covers **health information, race and ethnicity, religious or philosophical beliefs** and **political opinions** amongst other things.

We do not collect sensitive personal information about you unless there is a clear reason for doing so, such as involvement in an event where we need this information to ensure safeguarding, to carry out appropriate checks on volunteers, or care for participants. For some events we will collect health information so that leaders on our events have the relevant information to care for participants.

When we collect this information, we will make it clear to you what we are collecting and why and what are our legitimate interests or other legal grounds for processing this information.

Under 16s/under 13s

If you are aged 16 or under and would like to participate in an event, make a donation or get involved with us, please make sure that you have your parent or guardian's permission before giving us your personal information.

When we collect information about a child or young person, we will make it clear why we are collecting this information and how it will be used.

Children from 13 upwards may give their own consent in relation to any online services that we may offer.

How do we use personal data?

We may use the personal data that you provide in the following ways:

- to enable us to provide a service (pastoral care) for the benefit of our members and the wider public in a particular geographical area
- to administer membership records
- to process any donation(s) we may receive from you and to claim Gift Aid on these donations
- to run all church activities (including youth and children's programmes) efficiently
- to process event bookings
- to reimburse payments for church expenses incurred
- to provide you with information that you have requested about our work or our activities
- to provide you with information about other resources, events or programmes we offer that are similar to those you have already participated in or enquired about and to which you have not objected to receiving
- to communicate with supporters
- to record the contact that we have with you
- to fundraise and promote the interests of the church
- to invite you to participate in surveys or research
- to manage our employees, leaders and volunteers
- to maintain our own accounts and for internal record keeping
- to analyse and improve the services we offer
- to analyse the use of our websites and ensure their content is presented in the most effective manner for you and your device (see also our [cookies policy](#))

You can choose at any time which marketing materials you want to receive from HBC and in which format. If there is something you would prefer not to receive, please

email info@hollywoodbaptist.org.uk, write to our Data Protection team at **Hollywood Baptist Church, 67 Belfast Road, Hollywood, Co Down BT18 9ES**, or call us on **028 9042 1519**.

HBC's websites and cookies

Like many organisations, we use cookies to help us make our websites – and the way you use them – work better and to track information about how people are using them. For more information, see our [cookies policy](#).

Google Analytics

We use Google Analytics and other services to collect information about how our websites are used. These help us to know how often users visit our websites, what pages they visit when they do so, and how they use our content online.

Links to other websites

Our website contains links to other websites belonging to third parties and we sometimes choose to participate in social networking websites including, but not limited to, Facebook, WhatsApp, Twitter, and Instagram.

We may also include content from websites such as these on our website. However, we do not have any control over the privacy practices of these other websites. You should make sure when you leave our website that you have read and understood the other website's privacy policy in addition to our own.

Do we sell or share personal information?

We never sell or share your personal information with other organisations to use for their own purposes. However, if we run an event in collaboration with another named organisation, your details may need to be shared with them and those who provide services to help us deliver the event. We will make it clear what will happen to your data when you register.

In certain circumstances, the GDPR and the Data Protection Act 2018 allows personal data to be disclosed to local authorities, law enforcement and statutory agencies without the consent of the data subject. Under these circumstances, we will disclose the necessary data.

Sensitive/special categories of data

If you provide us with sensitive/special categories of personal data including, but not limited to, your racial or ethnic origin, political opinions, religious or philosophical beliefs or your physical or mental health, we will only use this for the specific purpose for which you gave permission and where it is within our legitimate interests to process or where we have other legal grounds to do so.

What is our legal basis for processing data?

We rely on a variety of legal bases for processing data depending on the purpose of the activity being undertaken.

We rely on **legitimate interests** where processing is necessary for the purposes of legitimate interests pursued by us or a third party except where such interests are overridden by your

interests, rights and freedoms, and having due regard to your reasonable expectations about the use of your data. These purposes include:

- where we need to use your data to engage in our normal day to day activities e.g. keeping a record of your name and address on our membership list
- emailing you information about related resources and events that you might be interested in, given your previous participation
- emailing other information about HBC such as our Annual Report or Membership matters

We also process your data in our capacity as a not-for-profit body with a political, philosophical, religious or trade union aim provided:

- the processing relates only to members of former members (or those who have regular contact with the church in relation to those purposes); and
- there is no disclosure to a third party without consent.

An example of this may be where a record of sensitive data may need to be kept by us so that effective pastoral care may be provided to you.

We may ask you for explicit consent. An example of this would be your consent to join one of our mailing list so that we can keep you informed about news, events, activities and services and process your gift aid donations and keep you informed about events.

We use **compliance with a legal obligation** as the basis for processing any legally required activities such as Gift Aid returns to HMRC, to maintain our legal obligations in maintaining certain records so that we may carry out our obligations under employment, social security or social protection law, or a collective agreement.

We use your **consent** for all the emails delivered by any of the activities and programmes run by HBC. Every email you receive provides a clear opportunity for you to opt out of/unsubscribe from future email newsletters.

Who has access to your personal information for processing data and how do we keep it safe?

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. This is very important to us and we take all necessary steps to ensure that any information we hold about you is safe.

Storing your information

Information is stored by HBC on secure servers at our offices, off-site and in the Cloud. We may also store information in paper files.

We have security measures in place to attempt to protect against the loss, misuse and alteration of personal data under our control. For example, only authorised personnel are able to access personal information, we ensure access to information is password protected or secured via locked filing cabinets.

While we cannot ensure or guarantee that loss, misuse or alteration of data will not occur while it is under our control, we use our best efforts to try to prevent this.

Any sensitive or special categories of data you may provide to us are only shared on an absolute need to know basis, and are deleted after each relevant event unless we need to keep that information for a longer period e.g. for safeguarding reasons.

We enforce strict procedures and security features to protect your information and prevent unauthorised access, although we cannot completely guarantee the security of any information you transmit to us.

Where you or we have provided a password enabling you to access parts of our websites or use our services, it is your responsibility to keep this password confidential. Please don't share your password with anyone. If you think anyone else has gained access to your password, please let us know as soon as possible.

We have put in place procedures to deal with any suspected personal breach and will notify you and the ICO where we are legally required to do so.

Transferring your information outside of Europe

Although most of the information we store and process stays within the UK, some information may be transferred to countries outside the European Economic Area (EEA).

This may occur if, for example, one of our supplier's servers on which personal information is stored is located in a country outside the EU or if we use a cloud IT platform where data is dispersed between a number of different servers. These countries may not have similar data protection laws to the UK. However, we will ensure that your privacy continues to be protected as outlined in this privacy policy and in accordance with our legal obligations under applicable data protection legislation.

By submitting your personal information to us you agree to this transfer, storing or processing at a location outside the EEA.

Provision of bank details

We hold bank account details for the purpose of transferring money, making donations, reimbursing expenditure and paying salaries, these bank details are held in a secure environment with our bank provider. Once your bank details have been stored within the secure online banking environment any residual bank details are destroyed.

Only those staff authorised to process payments will be able to see your bank details.

Sharing your information

Hollywood Baptist Church does not sell or share any information about you to other organisations.

Hollywood Baptist Church may disclose your personal information only in the following circumstances:

- Where we are under a duty to disclose your personal information in order to comply with any legal obligation (for example to government bodies, pension provider and law enforcement agencies), or in order to enforce or apply our rights (including in relation to

our website or other applicable terms and conditions) or to protect HBC (for example in cases of suspected fraud or defamation).

How long do we keep your data for?

- We have a retention policy for every personal data set. We will hold your personal information on our systems for as long as is needed to fulfil the function for which we hold the data or as long as is required by law for the relevant activity. For example, HMRC requires us to keep a record of donations, Gift Aid and financial transactions for seven years.
- If you request that we stop sending you marketing or fundraising information, we will keep a record of your contact details and appropriate information to enable us to comply with your request not to be contacted by us.
- Where your information is no longer required we will ensure that it is disposed of in a secure manner.
- Information will only be kept as long as is necessary for the purposes for which you provided it or we obtained it and will be minimised to ensure we only keep what is necessary.

What are your rights?

We'd like to keep all who engage with HBC up to date with events that we are holding. So, to update you on what we're doing and ask whether you are able to support us, we'd like to keep in touch with you (by phone, email, text and other electronic means) about our events and how you can continue to help us in this important mission.

We will not use your information for marketing purposes if you have asked us not to or we do not have your permission to use it for these purposes. (In certain circumstances we must obtain your permission before we contact you for marketing purposes.) However, we will retain your basic details on a suppression list to help ensure that we do not continue to contact you.

If you are registered to receive our emails, every email communication provides a clear opportunity for you to opt out of/unsubscribe from future email communications.

The Data Protection Act 2018 and the General Data Protection Regulation give you certain rights over your data and how we use it. You have the right to:

- request a copy of the information we hold about you and details of what we do with that information (known as a **subject access request**)
- update or amend the information we hold about you if it is wrong
- change your communication preferences at any time
- withdraw your consent to use of your personal information where we are relying on consent as the legal ground for processing it
- ask us to remove your personal information from our records
- ask us to restrict the processing of your personal information
- obtain a portable copy of certain personal information where this is processed automatically
- object to the processing of your information for marketing purposes
- raise a concern or complaint about the way in which your information is being used

- ask us to explain any automated processing we carry out and the impact of this on you

If you wish to exercise any of these rights, please contact our Data Protection team in writing at Data Protection team at **Hollywood Baptist Church, 67 Belfast Road, Hollywood, Co Down BT18 9ES**, email info@hollywoodbaptist.org.uk, or call us on **028 9042 1519**.

If we are not sure who you are, we may ask for reasonable proof of your identity before providing you with information or carrying out any of the above actions.

Complaints, compliments or comments

If you are unhappy with our work or something that we have done or failed to do, we want to know about it. We also welcome your views on what we do well. Your comments enable us as an organisation to learn and continuously improve our services. You can get in touch with us here.

If you wish to raise a data protection concern or complaint with a supervisory body, you can address a complaint to the Information Commissioner's Office. For more information, visit www.ico.org.uk, or in writing to the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF or telephone 0303 123 1113.