

1. Privacy Policy Contents

1.1.1. Version control

Version:	Date:	Author:	Changes:
3	19 th May 2019	Chris Rimmer	Minor updates
4	7 th October 2019	Chris Rimmer	Addition of sections on handling data from Children's Activities. Minor typos updated/
5	17 th November 2019	Chris Rimmer	Further refinements for approval

1.1.2. Use the links below to navigate quickly to the relevant section

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2. Introduction

2.1. About The Nottingham Road Trust

2.1.1. The Nottingham Road Trust (“NRT”) operates as *Christ Church Loughborough* and *North Church Leicester*.

1.1.1. NRT exists to 1) promote the Evangelical Christian faith, particularly through the promotion of church planting activity, through teaching, providing training resources, and conducting seminars and conferences to equip leaders with the skills required to deal with the spiritual and welfare needs of the church and the community; 2) The relief of financial hardship among persons either generally or individually through the provision of grants, goods or services as the trustees from time to time think fit; and 3) To advance the Christian faith in such ways as the trustees from time to time think fit;

2.1.2. The Data Controller, Nottingham Road Trust, is a UK charity with registration number 1147604, based at 63 Toothill Road, Loughborough, Leicestershire, LE11 1NP, UK.

2.1.3. We can be contacted at info@christchurchlboro.org or at <https://christchurchlboro.org/contact/>

2.2. About this privacy notice

2.2.1. NRT is committed to treating your private information with respect and operating legally and compliantly wherever we work.

2.2.2. As a charity based in the EU, we have chosen to apply the EU’s data privacy laws. known as the General Data Protection Regulations (GDPR) to all information we process, regardless of origin.

2.2.3. In-line with these regulations, we want to let you know:

2.2.3.1 What information we may collect about you;

2.2.3.2 What we use your personal information for;

2.2.3.3 How we store your personal information; and

2.2.3.4 Who (if anyone) we pass your information on to and for what purpose; and

2.2.3.5 How you can raise any concerns about the accuracy, processing or use of your personal information.

2.2.4. This privacy notice was drafted with brevity and clarity in mind. It does not provide exhaustive detail of all aspects of NRT’s collection and use of personal information. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the addresses above.

3. Information collection and storage

This section lays out when information is collected, why it is collected, where it is stored and how it is protected, along with relevant notes or other important statements.

3.1. Visitors to our websites

3.1.1. **When** – When someone visits <https://christchurchlboro.org>, we use a third-party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns.

3.1.2. **Why** – We do this to find out things such as the number of visitors to the various parts of the site.

3.1.3. **Where** – This information is stored on the Google Analytics servers in the Ireland and may be downloaded onto our staff's devices as part of their work.

3.1.4. **How** – Google's servers are encrypted and access is via a strong password through a password-protected device for a limited set of NRT staff members. [Read the Google Analytics Privacy Policy](#).

3.1.5. **Note** – We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website. This information is processed in such a way that does not identify anyone.

3.2. E-newsletter

3.2.1. **When** – When someone signs-up to our e-newsletter, we use a third-party service, MailChimp, to handle your contact information. MailChimp also gathers statistics around email-opening and clicks by using industry-standard technologies.

3.2.2. **Why** – We do this to keep in touch with you and so that we can monitor and improve our e-newsletter.

3.2.3. **Where** – The information is stored on MailChimp's servers in the USA and may be downloaded onto our staff's devices as part of their work.

3.2.4. **How** – MailChimp's servers operate within the EU Privacy Shield, are encrypted and access is via a strong password through a password-protected device for a limited set of NRT staff members. [Read the MailChimp Privacy Policy](#).

3.2.5. **Note** - When someone enters an email address to subscribe (whether directly on our website or through our web forms), we will send a confirmation to verify their identity before accepting a subscription. All emails contain an explanation of why the recipient is on the list as well as a simple option to unsubscribe at the bottom the message. Recipients may also unsubscribe by emailing info@christchurchlboro.org.

3.3. General web forms

3.3.1. **When** – When someone submits a form on our website, the website collects and handles the information before it is emailed across to a NRT email address.

3.3.2. **Why** – We do this to handle your enquiry.

3.3.3. **Where** – The information is stored on the Wix Sites servers in Europe before being shared to Google's servers across the world. [Read the Wix Sites Privacy Policy](#).

3.3.4. **How** – The Wix Sites servers are encrypted and access is via a strong password through a password-protected device for NRT staff members.

3.3.5. **Note** – If we do want to collect personally identifiable information through our web forms, we will be up-front about this. We will always make it clear when we collect personal information, will explain what we intend to do with it and on what lawful basis we are processing it – this will be in a statement above the ‘submit’ button on all forms.

3.4. Social media

3.4.1. **When** – When someone engages with us on social media, we use a third-party service, Facebook, to engage with you directly or through broadcast means. Facebook gather statistics around engagement and clicks by using industry-standard technologies.

3.4.2. **Why** – We do this to keep the general public aware of important, interesting and helpful news from NRT.

3.4.3. **Where** – The information is stored on Facebook’s servers across the world and may be downloaded onto our staff’s devices as part of their work.

3.4.4. **How** – Facebook’s servers are encrypted and access is via a strong password through a password-protected device for a limited set of NRT staff members. [Read the Facebook Privacy Policy](#).

3.4.5. **Note** - If you send us a private or direct message via social media, the message will be stored by Facebook for their standard terms. It will not be shared with any other organisations.

3.4.6. **Note** - NRT is not responsible for any other information collected on you by either Facebook

3.5. Email

3.5.1. **When** – when someone emails us, we use a third-party service, G Suite by Google, to handle and respond to your enquiry or contact.

3.5.2. **Why** – We do this to efficiently deal with your email and ensure we serve you in accordance with our mission statement.

3.5.3. **Where** – This information is stored on the Google servers in Ireland and may be downloaded onto our staff’s devices as part of their work.

3.5.4. **How** – Google’s servers are encrypted and access is via a strong password through a password-protected device by any of our staff. [Read the Google Privacy Policy](#).

3.5.5. **Note** - Any email sent to us, including any attachments, may be monitored and used by us for reasons of security and for monitoring compliance with our office policy. Please be aware that you have a responsibility to ensure that any email you send to is within the bounds of the law.

3.6. Donations

3.6.1. **When** – when someone donates, we use HSBC bank to process your donation.

3.6.2. **Why** – We do this to efficiently receive payments where banking transfers or cheques are not possible, to ensure that we can continue to fund our activities in accordance with our mission statement.

- 3.6.3. **Where** – This information is stored on HSBC’s servers around the world before being shared with our accountants in the UK. Information may be downloaded onto our staff’s devices as part of their work. We may share some payment information with HMRC to claim back gift aid on donations. Printed information is also kept in our office filing system.
- 3.6.4. **How** – HSBC’s servers are highly encrypted and access is via a strong password through a password-protected device by any of our staff. [Read the HSBC Privacy Policy](#). The office filing cabinet is locked when not in use, with a keycode required to access the key.
- 3.6.5. **Note** – NRT is not responsible for any other information you choose to share with your bank. We do not store full credit card or bank account details.

3.7. Children Consent Forms

- 3.7.1. **When** – when a responsible adult signs a child up to Summer on Sidings, Summer on Central, Summer in the Borough Bible Club, Christ Church Kids or Christ Church Youth, we receive information about the child(ren), their guardian and any needs that we should be aware of.
- 3.7.2. **Why** – We do this to discharge our duty of care to children attending our events in-line with our Safeguarding Policy, to ensure we can keep a register of attendance and to best enable the child(ren) to participate safely and fully in the event.
- 3.7.3. **Where** – This information is stored on the paper permission forms in our filing cabinet, in the General Web Forms system, on Elvanto or through our third-party service, G Suite by Google.
- 3.7.4. **How** – our filing cabinet is locked, the protection on the General Web Forms is described above and G Suite by Google’s servers are encrypted and access is via a strong password through a password-protected device by any of our staff. [Read the Google Privacy Policy](#). [Read the Elvanto Privacy Policy](#).
- 3.7.5. **Note** – Children’s personal data holds a special status within the GDPR. For this reason, the information is only accessible-to or shared-with those who need to know.

4. Information processing

This section lays out the basis for processing your information, what information is processed, who processes it and how long it is held for.

4.1. Answering enquiries

4.1.1. **Basis** – NRT has a legitimate interest to process personal data received from individuals to enable us to respond to your enquiry. Submitting an enquiry in whatever form means you are happy for us to use your personal information as described in this policy.

4.1.2. **What** – Some or all of the following information may be collected: full name, email address, postal address, phone number and the nature of your enquiry, which may include any personal information you choose to share with us.

4.1.3. **Who** – NRT administrative staff will receive the initial enquiry and may pass some or all of the information described above to relevant staff members or volunteers in order for us to respond effectively.

4.1.4. **How long** – Information from enquiries is held for up to 1 year in case you submit further enquiries in that time.

4.2. Assessing job applications

4.2.1. **Basis** – NRT has a legitimate interest to process personal data received from individuals when they apply to work at NRT. Submitting a job application means you are happy for us to use your personal information as described in this policy.

4.2.2. **What** – Some or all of the following information may be collected for: full name, email address, postal address, phone number, birthday, gender, ethnicity, marital status, educational background, work history, extra-curricular activities, skills, and any other information you choose to share about yourself as part of your application.

4.2.3. **Who** – NRT administrative and operations staff will receive the initial enquiry and may pass some or all of the information described above to relevant staff members or volunteers in order for us to respond effectively.

4.2.4. **Note** - Where we want to disclose information to a third-party, for example where we want to take up a reference or obtain a 'disclosure' from the UK Criminal Records Bureau or similar European agencies, we will not do so without informing them beforehand, unless the disclosure is required by law.

4.2.5. **Note** – Printed information is stored in our office filing cabinet, which is locked when not in use, with a keycode required to access the key.

4.2.6. **Note** – Information from job applications held for 1 year in case you submit further enquiries in that time.

4.3. Employment of staff

4.3.1. **Basis** – NRT has a contractual obligation to process personal data received from individuals who we employ. Signing your employment paperwork means you enter a contract with NRT for us to use your personal information as described in this policy.

4.3.2. **What** – Some or all of the following information may be collected: full name, email address, postal address, birthday, banking information, pension preferences and performance data.

4.3.3. **Who** – NRT administrative and operations staff may receive some or all of the information described above in order to fulfil our contractual obligations to the employee well.

4.3.4. **Note** – Information about employees will be held for 1 year after the termination of their employment contract in case of employment tribunal or other legal requirements.

4.3.5. **Note** – Printed information is stored in our office filing cabinet, which is locked when not in use, with a keycode required to access the key.

4.4. Church membership

4.4.1. **Basis** – NRT has a legitimate interest to process personal data received from individuals who are members of the church. Regular attendance of a Sunday gathering and/or donation to NRT means you are happy for us to use your personal information as described in this policy.

4.4.2. **What** – Some or all of the following information may be collected: full name, email address, postal address, gender, phone number, birthdate, family relatives, availability to be involved with church activities, religious beliefs and any other personal information you choose to share with us

4.4.3. **Who** – NRT administrative and operations staff may pass some or all of the information described above to relevant staff members or volunteers in order for you to be involved in the activities of NRT effectively.

4.4.4. **How long** – Information from church members is held for up to 1 year to allow ongoing management of NRT's activities.

4.4.5. **Note** - Where we want to disclose information to a third-party, for example where we want to take up a reference or obtain a 'disclosure' from the UK Disclosure and Barring Service or similar European agencies, we will not do so without informing them beforehand, unless the disclosure is required by law.

4.4.6. **Note** – Printed information is stored in our office filing cabinet, which is locked when not in use, with a keycode required to access the key.

4.5. Electronic Marketing

4.5.1. **Basis** – NRT has obtained consent from individuals to market to them electronically. Signing up to our e-newsletter and confirming your agreement with our privacy policy is taken as consent.

4.5.2. **What** – Some or all of the following information may be collected: full name, email address and industry-standard email performance data.

4.5.3. **Who** – NRT administrative and operations staff and its volunteers may use and process some or all of the information described above in order to market NRT to you.

4.5.4. **Note** – Information will be held until the contact unsubscribes. The marketing contact lists will be scrubbed twice yearly to remove information about contacts which is over a year old.

4.6. Children’s Activities

- 4.6.1. **Basis** – NRT has a legitimate interest to process personal data received from responsible adults who sign their child(ren) up to the church’s activities. In-line with our Safeguarding Policy, attendance at any of our events for children means that you are happy for us to use your and your child’s personal information as described in the policy.
- 4.6.2. **What** – Some or all of the following information may be collected: full name, age, sex, postal address, parent/guardian’s email address, parent/guardian’s phone number, dietary requirements, relevant health issues and any other personal information you choose to share with us.
- 4.6.3. **Who** – NRT administrative and operations staff may pass some or all of the information describe above to relevant staff members or volunteers in order for your child to be involved in the activities of the NRT as safely and fully as possible.
- 4.6.4. **How long** – Full information from children’s activities is held for 1 year on our systems. A small set of essential information is kept for safeguarding for longer – refer to the NRT Retention and Disposal Policy for more information. The children’s activities information is scrubbed twice yearly to remove information about children which has been kept longer than these periods.

4.7. Internal Uses

- 4.7.1. To help us fulfil our mission, we share information and data with some external processors and third-party applications. We have assessed all these processors to ensure our continued compliance with our obligations to users, clients and legislation such as the GDPR.
- 4.7.2. We list those processors here, since data may be shared with them, and outline the agreements in-place

Service:	Company:	Purpose:	Data Storage:	Terms Conditions: /
G Suite	Google Inc.	Emails	Google Privacy Policy	Terms of Service
QuickBooks	Intuit Limited (UK)	Financial management and accounting services	Various data centres around the world. Where these are outside the European Economic Area, these are under the EU-US Privacy Shield (see privacy-policy)	Terms of Service
Asana	Asana Inc.	Task Management	In US data centres under the EU-US Privacy Shield (see privacy-policy)	Terms of Service
WhatsApp	Facebook	Church membership communications	WhatsApp messages are end-to-end encrypted and stored in various data centres around the	Terms of Service



			world (see privacy-policy)	
Elvanto	Elvanto	Church management software	Elvanto Privacy Policy	Terms of Service
Cound	Cound & Co	Accountancy Services	N/A	Terms found on invoices

5. Your rights and notes

5.1. As a data subject, you may:

- 5.1.1. access and obtain a copy of your data on request;
- 5.1.2. require NRT to change incorrect or incomplete data;
- 5.1.3. require NRT to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing; (unless retention is required for legal reasons); and/or
- 5.1.4. object to the processing of your data where NRT is relying on its legitimate interests as the legal ground for processing.

5.2. Complaints or queries

- 5.2.1. NRT strives to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.
- 5.2.2. Please send any complaints to the details below.
- 5.2.3. You also have the right to lodge a complaint with the data protection supervisory authority, The UK Information Commissioner's Office (ICO) who can be contacted at <https://ico.org.uk/concerns/handling>

5.3. Access to personal information

- 5.3.1. NRT tries to be as open as it can be in terms of giving people access to their personal information. Individuals can find out if we hold any personal information by making a 'subject access request' under the GDPR. If we do hold information about you, within 30 days we will:
 - 5.3.1.1 give you a description of it;
 - 5.3.1.2 tell you why we are holding it;
 - 5.3.1.3 tell you who it could be disclosed to; and
 - 5.3.1.4 let you have a copy of the information in an intelligible form.

5.3.2. To make a request to NRT for any personal information we may hold, you need to put the request in writing addressing it to our Administrators, including your full name, postal address, daytime telephone number, whether you seek general information or specific information and proof of your identity.

5.3.3. With your permission, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone.

5.3.4. If we do hold information about you, you can ask us to correct any mistakes by, once again, contacting our Administrators.

5.4. Disclosure of personal information

5.4.1. We do not and will never disclose personal data without prior consent, except where required by law.

5.5. Links to other websites

5.5.1. This privacy notice does not cover the links within our websites linking to other websites. We encourage you to read the privacy statements on the other websites you visit.

5.6. Changes to this privacy notice

5.6.1. We review our privacy notice at least once per year. This privacy notice was last updated on 19th May 2019

5.7. How to contact us

5.7.1. If you want to request information about our privacy policy you can contact us directly through our website, email info@christchurchlboro.org or write to:

Data Controller
NRT
63 Toothill Road,
Loughborough
LE11 1NP