

Church Urban Fund Operational Privacy Notice

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1. Introduction

This notice describes how and why Church Urban Fund uses your personal information, how we protect your privacy when doing so, and your rights and choices regarding this information. We promise to respect any of your personal information which is under our control and to keep it safe. We aim to be clear when we collect your information about what we will do with it.

We are a charity who holds relationships with thousands of fundraisers, volunteers, supporters, so we use personal data on a day-to-day basis in order to operate. Our use of personal data allows us to make better decisions, fundraise more efficiently and, ultimately, helps us to reach our vision is to see people and communities across England flourish and enjoy life in all its fullness. This notice is effective from 25th May 2018.

2. Who we are

In this Privacy Policy, “**Church Urban Fund**”, “**CUF**”, “**we**”, or “**our**” means:

Church Urban Fund (registered charity in England and Wales (297483), a company limited by guarantee in England (02138994).

For the purposes of Data Protection Legislation, we are the Data Controller for any personal data that we collect, use or store about you.

3. How we collect information about you

We collect data in the following ways:

Personal data you provide to us directly

We will ask you for personal data in order to sign up for one of our events, make a donation, purchase our products, register as a volunteer, ambassador for us, join our newsletter or are involved

in any of our Together Network, Near Neighbours or Just Finance Foundation events or programmes, apply for funding, or otherwise communicate with us.

When you use our website, we collect your personal data using “cookies” and other tracking methods. There are more details on the cookies and tracking methods on our website.

In addition, in accordance with common website practice, we will receive information about the type of device you’re using to access our website or apps and the settings on that device may provide us with information about your device, including what type of device it is, what specific device you have, what operating system you’re using, what your device settings are, and why a crash has happened. Your device manufacturer or operating system provider will have more details about what information your device makes available to us.

Personal data you provide to us indirectly

Depending on the purpose for processing, your personal data may be shared with us by third parties. In such cases, where we have contact details for you, we will contact you and let you know. Examples of who may share your data with us include:

- professional fundraising agencies;
- independent event organisers, for example the London Marathon or fundraising sites like Just Giving or Virgin Money Giving;
- if you sign up as a volunteer for us through a Job Centre or external volunteering website;
- if you are a researcher and your data is shared with us by the principal investigator or institution.

We also receive data about you from subcontractors acting on our behalf who provide us with technical, payment or delivery services, and from business partners, advertising networks and search/analytics providers used on our website. Where we collect data about you indirectly, we will ensure that you receive a copy of this privacy notice as soon as practical and in any case, before we use your personal data for any purpose.

Personal data from other sources

We use personal data from the following sources:

Social Media

Depending on your settings or the privacy policies for social media and messaging services, you might give us permission to access data from those services, for example when you contact us or publicly tag us in an event photo. Where your interaction with us allows us access to your personal data within your social media presence, we will not collect, store or use data unless it is specifically necessary for us to achieve one of the purposes outlined in this privacy policy.

Personal Data available in the public domain

We supplement information on our supporters with information from publicly available sources such as charity websites and annual reviews, corporate websites, public social media accounts, the electoral register and Companies House in order to create a fuller understanding of someone’s interests and support of Church Urban Fund. For more information, please see our section on “Building profiles of supporters” below.

4. What personal information we collect

The personal data we collect about you depends on the context of the relationship you have with CUF. We collect, store and use the following kinds of personal data. We will only collect this data where we have a clear and specific purpose.:

- your name;

- your contact details (including postal address, telephone number, e-mail address and/or social media identity);
- your date of birth;
- your gender;
- your bank or credit card details where you provide these to make a payment;
- if you volunteer for us or apply for a job with us, information necessary for us to process these applications and assess your suitability (which may include things like employment status, previous experience depending on the context, as well as any unspent criminal convictions or pending court cases you may have);
- if you apply for funding, information necessary to process your application.
- information about your activities on our website(s) and about the device you use to access these, for instance your IP address and geographical location;
- information about events, activities and products which we consider to be of interest to you;
- information relating to your health (for example if you are taking part in or attending an event for health and safety purposes);
- where you have left us a legacy, any information regarding next of kin with which you may have provided us to administer this;
- information as to whether you are a taxpayer to enable us to claim Gift Aid;
- age, nationality and ethnicity information for monitoring purposes to ensure we comply with equality and diversity legislation; and
- any other personal data you provide to us.

Certain types of personal data are in a special category under data protection laws, as they are considered to be more sensitive. Examples of this type of sensitive data would be information about health, race, religious beliefs, political views, trade union membership, sex life or sexuality or genetic/biometric information.

We would only collect this type of data about our supporters to the extent that there is a clear reason for us to do so, for example asking for health information if you are taking part in one of our sporting events, or where we ask for information for the purpose of providing appropriate facilities or support. We will also collect this type of information if you make it public or volunteer it to us – for instance if you tell us about a disability when applying for an Volunteer role. Wherever it is practical for us to do so, we will make why we are collecting this type of information clear and what it will be used for.

5. How we use your information

We will use your personal information to:

- provide you with the services, products or information you asked for;
- administer your donation or support your fundraising, including processing Gift Aid;
- keep a record of your relationship with us;
- respond to or fulfil any requests, complaints or queries you make to us;
- understand how we can improve our services, products or information by conducting analysis and market research;
- manage our events;
- check for updated contact details against third party sources so that we can stay in touch if you move (see “Keeping your information up to date” below);
- further our charitable objectives;
- register, administer and personalise online accounts when you sign up to products we have developed;
- send you correspondence and communicate with you;
- process applications for funding and for administration of our role in the projects we fund;
- administer our websites and to troubleshoot, perform data analysis, research, generate statistics and surveys related to our technical systems;
- testing our technical systems to make sure they are working as expected;
- contact you if enter your details onto one of our online forms, and you don’t ‘send’ or ‘submit’ the form, to see if we can help with any problems you may be experiencing with the form or our websites;

- display content to you in a way appropriate to the device you are using (for example if you are viewing content on a mobile device or a computer);
- generate reports on our work, services and events;
- safeguard our staff and volunteers;
- conduct due diligence and ethical screening;
- monitor website use to identify visitor location, guard against disruptive use, monitor website traffic and/or personalise information which is presented to you;
- process your application for a job or volunteering position;
- conduct training and quality control;
- audit and administer our accounts;
- meet our legal obligations, for instance to perform contracts between you and us, or our obligations to regulators, government and/or law enforcement bodies;
- carry out fraud prevention and money laundering checks;
- undertake credit risk reduction activities; and/or
- establish, defend or enforce legal claims.

6. How we use your information to tell you about our work

Sending marketing communications

Our marketing communications include information about our latest developments, campaigns and requests for donations or other support. Occasionally, we may include information from partner organisations or organisations who support us in these communications. We operate an 'opt-in only' communication policy. This means that, except as set out below, we will only send marketing communications to those that have explicitly stated that they are happy for us to do so.

We may use information you have given us directly, for example the record of your previous donations to and/or relationship with us, your location and demographics, as well as the type of activity you have been involved with, to tailor our communications with you about future activities.

Events and fundraising

When you have asked for details of a CUF event, we will send you information including, where relevant, ideas for fundraising and reminders on key information about the activity.

Where you have signed up for an event with a third party (for example the London Marathon) and told the event organiser that you wish to fundraise for us, we may contact you with information and support for your fundraising for that event.

Managing your contact preferences

We endeavour to make it as easy as possible for you to tell us how you want us to communicate, in a way that suits you. Our forms have clear marketing preference questions and we include information on how to opt out when we send you marketing. If you don't want to hear from us, that's fine, and you can change your preferences at any time. Just let us know when you provide your data or contact us on 0203 752 5655 or hello@cuf.org.uk.

If you've decided you don't want to be contacted for marketing purposes, we may still need to contact you for administrative purposes. This may include where we are processing a donation you've made and any related Gift Aid, thanking you for a donation or participation in an event, or keeping in touch with you about volunteering activities you are doing for us.

Building profiles of supporters

At CUF, our transformational work is only made possible thanks to the generosity of our supporters – so it's vital that our fundraising efforts are as effective as they can be. By developing a better understanding of our supporters through researching them using publicly available sources we can tailor and target our fundraising events and communications (including volunteering opportunities) to those most likely to be interested in them. This allows us to be more efficient and cost-effective with our resources, and also reduces the risk of someone receiving information that they might find irrelevant, intrusive or even distressing.

What information do we collect?

After taking a supporter's communications preferences into account, we use information we hold on them to research their potential to be a significant donor to CUF and collect details relating to their employment and any philanthropic activity. We may also estimate their gift capacity, based on their visible assets, history of charitable giving and how connected they are to CUF.

Which information do we use?

We use existing data from CUF's own database and combine this with information from publicly available sources such as charity websites and annual reviews, corporate websites, public social media accounts, the electoral register and Companies House in order to create a fuller understanding of someone's interests and support of CUF. We only use reputable sources, where someone would expect their information may be read by the public. We avoid any data that we believe has not been lawfully or ethically obtained, and we do not use information sources which have not been broadcast or made public.

7. Legal basis for processing

When we collect and use your personal data, we must have a valid lawful basis in order to comply with data protection law. The lawful basis we use will depend on the purpose we have for collecting your personal data and how this data will be used. Our lawful basis and corresponding purposes have been set out below.

Specific consent

Consent is where we ask you if we can use your information in a certain way, and you agree to this. We will collect your consent for processing personal data for the following purposes:

- Direct Marketing when we send you marketing material via post, phone, text or e-mail.
- Market research

When we need your consent for processing we will make it clear that we can only carry out the activity with your consent which we will gain either by use of an "opt in" tick box or an alternative affirmative action.

Where we use your information for a purpose based on consent, you have the right to withdraw consent for any future use of your information for this purpose at any time.

Legal obligation

In some cases, we will process your personal data in a way that will allow us to comply with our legal or regulatory obligations. We rely on this lawful basis when:

- We need to share your information with our various regulators such as the Charity Commission, Fundraising Regulator, Information Commissioner or Gambling Commission

Performance of a contract / take steps at your request to prepare for entry into a contract

We have a basis to use your personal data where we are entering into a contract with you or performing our obligations under that contract. We rely on this lawful basis when:

- You are buying something from us (for instance some branded merchandise or, in some cases, an event place),
- You apply to work/volunteer with us, or being funded to undertake research.
- You work with us as a supplier, or contractor

Vital interests

We have a basis to use your personal data where it is necessary for us to protect life or health. We will rely on this lawful basis when:

- We need to provide information or share personal data with the emergency services.
- We need to notify a next of kin about an emergency.

Legitimate interests

We have a basis to use your personal data if it is reasonably necessary for us (or others) to do so and in our/their “legitimate interests” provided that what the personal data is used for complies with the law, is fair and does not unduly impact your rights).

We rely on this lawful basis when:

- analysis and profiling of our supporters using personal information we already hold;
- updating your address using third party sources if you have moved house (please see the “Keeping your information up to date” section below for more on this).
- use of personal data when we are monitoring use of our website or apps for technical purposes;
- We share personal data between relevant teams and committees within CUF
- where you have signed up with us on a charity place for a third-party event (for example a sponsored run not organised by CUF), sharing personal information with the third-party event organiser so they can administer the event.

We only rely on legitimate interests where we consider that any potential impact on you (positive and negative), how intrusive it is from a privacy perspective and your rights under data protection laws do not override our (or others’) interests in us using your information in this way.

When we use sensitive personal data (please see the “What personal information we collect” section above), we require an additional legal basis to do so under data protection laws.

Where we collect special category data relating to your employment or volunteering with us we collect this in order to ensure that we can comply with legislation relating to employment, social security and social protection law.

Where we collect special category data relating to our activities as a not for profit we will process special category data for our internal use only. We will not share this data externally without your consent and we will not use the special category data to make decisions related to our approach to direct marketing.

8. How we keep your information safe

We ensure that there are appropriate technical and organisational controls (including physical, electronic and managerial measures) in place to protect your personal data. Data stored electronically is encrypted and access to the data is limited to what is necessary depending on the purpose. All staff receive data protection training and we have monitoring.

9. How long we keep your information for

CUF has specific criteria to determine how long we will retain your information for, which are determined by legal and operational considerations. For instance we are required to keep some personal information for tax or health and safety purposes, as well as keep a record of your interactions with us

10. Keeping your information up to date

Periodically, we use information from external sources such as the post office national change of address database and/or the public electoral roll to identify when we think you have changed address so that we can update our records and stay in touch. We only use sources where we are confident that you've been informed of how your information may be shared and used.

We do this so we can continue to contact you where you have chosen to receive marketing messages from us and contact you if we need to make you aware of changes to our terms or assist you with problems with donations.

This activity also prevents us from having duplicate records and out of date preferences, so that we don't contact you when you've asked us not to.

We're committed to putting you in control of your data and you're free at any time to opt out from this activity. To find out more, please contact us on 0203 7525655 or hello@cuf.org.uk . We really appreciate it if you let us know if your contact details change.

11. Your rights

Under UK data protection law, you have rights over personal data that we hold about you. You can exercise your rights at any time by contacting us at dataprotection@cuf.org.uk. When you submit a request, we are legally required to ensure that the request is valid and that we verify your identity. Once we are satisfied that a valid request has been received, we have one month to respond. We've summarised your rights below. For further detailed information on your rights, you can visit: ico.org.uk/your-data-matters.

Right to access your personal information

You have a right to request access to the personal data that we hold about you free of charge. You also have the right to request a copy of the information we hold about you, and we will provide you with this unless legal exceptions apply.

Right to have your inaccurate personal data corrected

You have the right to have inaccurate or incomplete information we hold about you corrected. If you believe the information we hold about you is inaccurate or incomplete, please provide us with details and we will investigate and, where applicable, correct any inaccuracies.

Right to restrict use of your personal data

You have a right to ask us to restrict the processing of some or all of your personal data in the following situations: if some information we hold on you isn't right; you believe we're not lawfully allowed to use it; you need us to retain your information in order for you to establish, exercise or defend a legal claim; or you believe your privacy rights outweigh our legitimate interests to use your information for a particular purpose and you have objected to us doing so.

Right to erasure of your personal data

You may ask us to delete some or all of your personal data and in certain cases, and subject to certain exceptions, you have the right for this to be done.

Right for your personal data to be portable

If we are processing your personal information (1) based on your consent, or in order to enter into or carry out a contract with you, and (2) the processing is being done by automated means, you may ask us to provide it to you or another service provider in a machine-readable format.

Right to object to the use of your personal data

Where we process your personal data based on our legitimate interests or for scientific/historical research or statistics, you have a right to object to our use of your data in some limited circumstances.

If we are processing your personal data for direct marketing purposes, and you wish to object, we will always agree stop processing your information for these purposes as soon as reasonably possible.

Please note that exceptions apply to a number of these rights, and not all rights will be applicable in all circumstances.

12. Complaints

If you are unhappy with any aspect of how we are using your personal data, we'd like to hear about it. We appreciate the opportunity this feedback gives us to learn and improve. You can find out more by contacting dataprotection@cuf.org.uk.

If you are unhappy with our response to your complaint, you can lodge a complaint with the Information Commissioners Office who regulate data protection in the UK. You can contact them via ico.org.uk.

13. Changes to this policy

We may change this Privacy Policy from time to time. If we make any significant changes in the way we treat your personal information we will make this clear on the CUF website

14. Contact us

If you have any questions, comments or suggestions, please let us know by contacting us at dataprotection@cuf.org.uk or by phone on 020 3752 5655

CUF also has a Data Protection Officer, who can be contacted at:

Protection Officer
Church Urban Fund
The Foundry,
17 Oval Way
London,
SE11 5RR
Email: dataprotection@cuf.org.uk