

Church Urban Fund

Privacy policy

Contents

1. Introduction.....	1
2. Who we are	1
3. How we collect information about you	1
4. What personal information we collect	2
5. How we use your information.....	3
6. How we use your information to tell you about our work	4
7. Legal basis for processing	5
8. How we keep your information safe	6
9. How long we keep your information for.....	6
10. Keeping your information up to date	6
11. Your rights.....	6
12. Complaints	7
13. Changes to this Policy.....	8
14. Contact us	8

1. Introduction

This policy 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 information on a day to day basis in order to operate. Our use of personal information 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 policy 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).

3. How we collect information about you

We collect information in the following ways:

Information you provide to us directly

You may give us your information 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 information 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.

Information you provide to us indirectly

Your information may be shared with us by third parties, for example:

- 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 information is shared with us by the principal investigator or institution.

We also may 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.

You should check any privacy policy provided to you where you give your data to a third party.

Information from other sources

We also use information from the following sources:

Social Media

Depending on your settings or the privacy policies for social media and messaging services like Facebook, WhatsApp or Twitter, you might give us permission to access information from those services, for example when you publicly tag us in an event photo.

Information available publicly

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

We collect, store and use the following kinds of personal information:

- 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; and
- any other personal information you provide to us.

Certain types of personal information 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 information 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 Ambassador 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 additional 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

Data protection laws mean that each use we make of personal information must have a "legal basis". The relevant legal bases are set out in the General Data Protection Regulation (EU Regulation 2016/679) and in current UK data protection legislation.

Specific consent

Consent is where we ask you if we can use your information in a certain way, and you agree to this (for example when we send you marketing material via post, phone, text or e-mail). 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

We have a basis to use your personal information where we need to do so to comply with one of our legal or regulatory obligations. For example, in some cases we may need to share your information with our various regulators such as the Charity Commission, Fundraising Regulator, Information Commissioner or Gambling Commission, or to use information we collect about you for due diligence or ethical screening purposes.

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

We have a basis to use your personal information where we are entering into a contract with you or performing our obligations under that contract. Examples of this would be if you are buying something from us (for instance some branded merchandise or, in some cases, an event place), applying to work/volunteer with us, or being funded to undertake research.

Vital interests

We have a basis to use your personal information where it is necessary for us to protect life or health. For instance if there were to be an emergency impacting individuals at one of our events, or a safeguarding issue which required us to contact people unexpectedly or share their information with emergency services.

Legitimate interests

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

We consider our legitimate interests to include all of the day-to-day activities CUF carries out with personal information. Some examples not mentioned under the other bases above where we are relying on legitimate interests are:

- 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 information when we are monitoring use of our website or apps for technical purposes;
- use of personal information to administer, review and keep an internal record of the people we work with, including supporters, volunteers and researchers;
- sharing of personal information 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 information (please see the "What personal information we collect" section above), we require an additional legal basis to do so under data protection laws, so will either do so on the basis of your explicit consent or another route available to us at law for using this type of information (for example if you have made the information manifestly public, we need to process it for employment, social security or social protection law purposes, your vital interests, or, in some cases, if it is in the public interest for us to do so).

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 details. For example our online forms are encrypted and our network is protected and routinely monitored.

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

We may 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 203 752 5655 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 information that we hold about you. We've summarised these below:

Right to access your personal information

You have a right to request access to the personal data that we hold about you. 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.

If you want to access your information, send a description of the information you want to see by post to Data Protection Officer, Church Urban Fund. The Foundry, 17 Oval way, London, SE11 5RR or by email to hello@cuf.org.uk .

Right to have your inaccurate personal information 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 information

You have a right to ask us to restrict the processing of some or all of your personal information in the following situations: if some information we hold on you isn't right; 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 information

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

Right for your personal information 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 information

If we are processing your personal information based on our legitimate interests or for scientific/historical research or statistics, you have a right to object to our use of your information.

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

If you want to exercise any of the above rights, please contact us on Data Protection Officer, Church Urban Fund. The Foundry, 17 Oval way, London, SE11 5RR or by email to hello@cuf.org.uk . We may be required to ask for further information and/or evidence of identity. We will endeavour to respond fully to all requests within one month of receipt of your request, however if we are unable to do so we will contact you with reasons for the delay.

Please note that exceptions apply to a number of these rights, and not all rights will be applicable in all circumstances. For more details we recommend you consult the guidance published by the [UK's Information Commissioner's Office \(ICO \(link is external\)\)](#)

12. Complaints

If you are unhappy with any aspect of how we are using your personal information we'd like to hear about it. We appreciate the opportunity this feedback gives us to learn and improve. You can find out more and read our Complaints Policy.

You also have the right to lodge a complaint about any use of your information with [the Information Commissioners Office \(link is external\)](#), the UK data protection regulator

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 or by contacting you directly.

14. Contact us

If you have any questions, comments or suggestions, please let us know by contacting our Communication's team at hello@cuf.org.uk or by phone on 0203 752 5655.

CUF also has a Data Protection Officer (Chris Biglands), who can be contacted at:

The Data Protection Officer
Church Urban Fund
The Foundry, 17 Oval way, London, SE11 5RR
Email: chris.biglands@cuf.org.uk