## Harrow Street Pastors General Privacy Notice How the information we hold on you will be used

- 1. Personal data is any information about a living individual which allows them to be identified (eg a name, email address, address, image, ID number). Identification can be by the personal data alone or in conjunction with any other information.
- 2. Your information/personal data will be held by Harrow Street Pastors (the local initiative). You can contact Harrow Street Pastors as a data controller and for any data protection enquires by post by writing to:

Data Protection Officer c/o St Michael & All Angels' Church 95 Bishop Ken Road Harrow. HA3 7HP

By email at <u>harrow@streetpastors.org.uk</u> and by telephone on 07796 342320.

- 3. Harrow Street Pastors is part of a wider network of Street Pastor initiatives in the UK coming under the umbrella of Ascension Trust, a charity registered in the UK, who all work together to deliver the Street Pastors' mission in communities throughout the UK. We may need to share personal data that we hold with them so that they can carry out their responsibilities in our community. The Street Pastor network and Ascension Trust are joint data controllers and all responsible to you for how your personal data is processed. This privacy notice is sent to you by Harrow Street Pastors on our own behalf and on behalf of these other data controllers.
- 4. As data controllers we will comply with our legal obligations towards you to keep any personal data we hold on you up to date; to store and destroy it securely; not to collect or retain excessive or unnecessary amounts of data; to keep your personal data secure, and protect it from loss, unauthorised access, misuse and disclosure.
- 5. We will use your personal data for some or all of the following purposes:
  - (a) to enable us to deliver the Street Pastor mission to our local community, and to carry out other charitable or voluntary activities for public benefit as provided for in the governing document and statutory framework of the local initiative and its other joint controllers;
  - (b) to fundraise and promote our work;
  - (c) to send you communications which you may have requested or that may be of interest to you about our operations, events, fundraising activities, campaigns and appeals.
  - (d) to process a donation that you have made (including Gift Aid information);
  - (e) to maintain our records and accounts;
  - (f) to keep you notified of changes to the service that we provide, events or personnel within the local initiative;
  - (g) to seek your comments or views;
  - (h) to process applications for a role;

- to enable us to provide a voluntary service for the benefit of the public in a particular geographical area as specified in our governing document.
- 6. We may process the following personal data:
  - (a) Names, titles, aliases, photographic images.
  - (b) Contact details, eg telephone numbers, addresses and email addresses.
  - (c) Where relevant we may process demographic information such as your date of birth, marital status, nationality, family composition, dependants, education/work histories, academic/professional qualifications and employment details.
  - (d) Where you make donations or pay for activities or merchandise, financial identifiers such as bank account numbers, payment card numbers, payment/transaction identifiers, policy numbers, and claim numbers.
  - (e) Other operational personal data created, obtained, or otherwise processed in the course of the local initiative carrying out our activities including, but not limited to, recordings of telephone conversations, IP addresses and website visit histories, and logs of visitors.
  - (f) The data we process will likely include sensitive personal data because as a Christian organisation the fact that we process your data may be suggestive of your religious beliefs. The local initiative may also process other categories of sensitive personal data revealing racial or ethnic origin, religious or philosophical beliefs, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, and data concerning health.
- 7. Whilst we will rely on your consent as a legal basis for this processing, we will also have a legitimate interest for processing your personal data in order to facilitate the Street Pastor mission. As a religious organisation we may process information about your religious believe to administer membership or contact details. Whilst exercising our legitimate interest we will always take into account your interests, rights and freedoms.
- 8. Some of our processing is necessary for compliance with a legal obligation. Where your personal data is used other than in accordance with one of these legal bases, we will first obtain your consent to that use.
- 9. Your personal data will be treated as strictly confidential. It will only be shared with third parties including other data controllers where it is necessary for the performance of our tasks or where you first give us your prior consent.
- 10. We may also share your personal data with our agents, servants and contractors. For example, we may ask a commercial provider to send out newsletters on our behalf, or to maintain our database software.
- 11. It is not envisaged that your personal data will be transferred to any party outside of the UK, but in the event that this needs to be done, your consent will be sought beforehand. Any electronic personal data transferred to

countries or territories outside the EU will only be placed on systems complying with measures giving equivalent protection of personal rights either through international agreements or contracts approved by the EU. Our website is also accessible from overseas so on occasion some personal data (for example in a newsletter) may be accessed from overseas.

- 12. We will keep your personal data only for as long as we need it and in line with our Data Retention Policy and we will delete it when it is no longer needed. Elements of your personal data may be retained by the organisation for historical, statistical or research purposes.
- 13. We will keep some records permanently if we are legally required to do so. We may keep some other records for an extended period of time. For example, it is current best practice to keep financial records for a minimum period of 7 years to support HMRC audits.
- 14. As a person whose personal data Harrow Street Pastors holds (a data subject) you have the following rights:
  - (a) The right to be informed of your rights as a data subject through this privacy notice.
  - (b) The right of access to the information Harrow Street Pastors holds on you.
  - (c) The right to correct the information we hold on you.
  - (d) The right to erase the information we hold on you.
  - (e) The right to restrict processing of your personal data
  - (f) The right to data portability and the transfer of your personal data to another data controller.
  - (g) The right to object to the processing of your personal data.
  - (h) Rights in relation to automated decision making and profiling.
- 15. When exercising any of the rights listed above, in order to process your request, we may need to verify your identity for your security. In such a case we may need you to verify your identity before you can exercise these rights.
- 16. You have the right to withdraw your consent to the processing of your personal data by Harrow Street Pastors at any time.
- 17. Harrow Street Pastors currently has no automated decision making or profiling activities. If in future these activities are to occur, you will be notified, and your consent sought before your personal data is processed in this manner.
- 18. Should you be dissatisfied with the way in which the organisation has processed your data you have the right to submit a complaint to the Information Commissioner's Office:

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

www.ico.org.uk/concerns/handling/