



Redeemer Central
101 Donegall St
Belfast
BT1 2FJ
admin@redeemercentral

DATA PRIVACY NOTICE

Redeemer Central

March 2020

1. Introduction

Redeemer Central is a church – a religious organisation registered as a charitable company. Redeemer Central also acts as an events venue under the names “101 Donegall Street” and “101”. We care deeply about the data protection and data privacy of our congregation, clients and employees.

This document outlines the Data Privacy Notice of Redeemer Central in full. The document was prepared by Megan Joyce and approved by the Directors of Redeemer Central.

2. Key Terms

- **Data** – Any information about a person (data subject) inc. address, photos, sensitive information, etc.
- **Special Category Data** – Any information which is particularly sensitive like religion, medical info, criminal convictions. It has additional rules for holding and processing.
- **Data Subject** – Any individual on whom we hold data.
- **Data Controller** – The organisation which holds the data – Redeemer Central.
- **Data Processor** – Any third party which processes data on the Data Controller’s behalf, e.g. mailing hosts, database software
- **Data Lead** – The point of contact for all queries relating to data protection, in our case, the administrator, Megan Joyce.

3. Your personal data – what is it?

Personal data is any information which can be used to identify a person (you). Identification can be by that information alone or in conjunction with any other information which we possess or could possess. The processing of personal data is governed by the General Data Protection Regulation (the “GDPR”).

4. Who are we?

We, Redeemer Central count as a data controller. This means we decide how your personal data is processed and for what purposes. We do not have a Data Protection Officer; however, we do have a Data Lead who is our Administrator, Megan Joyce. Contact details are in Section 14.

5. What is the legal basis for processing your personal data?

The law allows us to process your data for any of the following reasons:

- **Consent** – We require your explicit consent so that we can keep you informed about news, events, activities and services organised, hosted and promoted by Redeemer Central;
- **Legal Obligation** – We are required by law to hold and process Gift Aid and donation data, which must be disclosed to HMRC, and any other data needed to conform to UK law;
- **Contract** – Relevant personal data is held and processed when you enter a contract with Redeemer Central, for example when hiring the venue 101 Donegall St;
- **Vital Interests** – Data may be held and processed in the interest of protecting life, and the subject is unable to give consent, for example, reporting the abuse of a minor to the police;
- **Public Tasks** – In order to serve the public interest, we may need to retain certain public records;
- **Legitimate Interests** – We can process data according to our legitimate needs and will hold and process your data reasonably, for example, if someone asks to attend a newcomers’ night we will add them to the appropriate mailing list and contact them only about relevant events.

6. What data do we collect?

Below are the details we will process, our legal basis for doing so, and why we do:

Category	Legal Basis	Use
Full Name	All	All
Consent	Legal Obligation	To maintain or cut contact as requested
Phone numbers	Consent, Contract	To maintain appropriate contact
Email addresses	Consent, Contract	To maintain appropriate contact and keep you informed of church activities
Home address	Consent	Full address when the subject is hosting an event in their home
Bank details/Gift Aid	Legal Obligation, Contract	For HMRC tax returns, when hiring the venue or purchasing items
Gender, marital status	Consent	For helping to assign groups and rotas
Church involvement/preferences	Legitimate Interests	To connect you to the right city group, serving team or ministry area.
Pastoral Details	Consent	For prayer ministry, counselling, etc.
Any other data	As notified	As required

6.1. Special Category Data

- Special category data are types of sensitive personal data consisting of information such as your religious or philosophical beliefs. For a full list see: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/special-category-data/>

In accordance with the law, we may hold and use special category data, although we endeavour to retain as little information as possible.

We process the personal data of our employees, customers, volunteers and members. When required we process the personal data of attendees to events we hold or host. Employees and interns have additional data which is laid out in the employee handbook, available by contacting the Administrator via the details in Section 14.

6.2. Consequences of Withholding Consent

If you do not consent to give your email or phone number we will be unable to inform you of events. Involvement in small groups and serving teams will be almost impossible as we use email and phone to maintain contact and distribute rotas.

7. How do we process your personal data?

Redeemer Central complies with its obligations under the “GDPR” by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

We use your personal data for the following purposes:

- To administer community records;
- To fundraise and promote the interests of the charity;
- To manage our employees and volunteers;
- To maintain our own accounts and records (including the processing of gift aid applications);
- To inform you of news, events, activities and services running at Redeemer Central;

We do not sell your personal data for any reason. We may use automated processing solely for the purpose of informing you of relevant events or conducting requested services, for example, email loops and payments. We do not profile or automate processing without consent.

8. Protecting your personal data

8.1. Access

Access to personal data held by Redeemer Central will be granted only as required, where that access is not considered a data breach. Access within the church premises is always restricted through physical locks and data encryption.

8.2. Encryption and Security

Redeemer Central IT systems are protected by firewalls, both on the network and individual devices. Any church member with access to personal data held by Redeemer Central will be expected to use encryption (and anti-virus software where appropriate) on any device they use to access the data with.

8.3. Training

All directors, staff and interns will receive initial training and yearly refresher training on data protection based on resources published by the Information Commissioner’s Office.

Any other church member requiring access to personal data held by Redeemer Central will be inducted when they are given access.

8.4. Breaches

A personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data.

When a breach occurs, Redeemer Central will:

1. Log and fix the breach.
2. If the breach may cause detriment, we will attempt to inform you of the breach.
3. If there is significant potential detriment we will also inform the ICO within 72 hours.

9. Sharing your personal data

Your personal data will be treated as strictly confidential “Special Category Data” and will only be shared with other members of the church in order to carry out a service to church members or for purposes connected with the church. We will only share your data with third parties outside of the church with your consent.

9.1. Non-EU Data Processors

Many of our data processors are based in the US. They are all covered by, or working towards being covered by, the EU-US Data Privacy Shield.

10. Personal Data Retention

We retain personal data under the following circumstances:

- While it is still current and the subject wishes to remain in contact;
- Where the subject has left the church and is not in contact for up to 1 year;
- Gift aid declarations and associated paperwork for up to 6 years after the calendar year to which they relate;
- Employee data retention is detailed in the employee handbook.

A yearly data audit will be conducted to ensure Redeemer Central remains compliant with GDPR. Personal data which exceeds the aforementioned timelines will be deleted at that point. Paper records will be shredded. Digital records will be permanently deleted, with backups being overwritten in the next backup cycle. Where data is stored on a third party cloud, the third party will delete that data permanently after 30 days.

11. Your Rights under GDPR

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- **Information** – The right to be informed of your rights, how to exercise your rights and who to contact;
- **Access** – The right to access a copy of your data for free, in the same format as the request;
- **Rectify** – The right to rectification of inaccurate or incomplete data;
- **Erasure** – The right to ‘be forgotten’ where consent is withdrawn, processing is not justified or processing would be unlawful. Erasure cannot be guaranteed where a legal basis for holding and processing remains;
- **Block/Restrict** – The right to block or restrict processing where the legitimacy of processing has been called into question. Redeemer Central must continue to process enough data to uphold the right;
- **Transport** – The right to data portability: To move, copy or transfer data from one IT environment to another, in a safe and secure way, without hindrance to the usability of the data. Redeemer Central will comply with this right by providing a CSV file of the subject’s data by email;
- **Objection** – The right to object to processing based on legitimate grounds, direct marketing or research/statistics. Processing will stop if Redeemer Central cannot provide compelling legitimate grounds for continuing;
- **Withdraw Consent** – The right to withdraw consent where it was previously given, at any time;
- Rights relating to **automated decision-making**: We require explicit consent or specific lawful authorisation to automate the processing of personal data or apply Profiling.

We will comply with these rights within 30 days, for free.

You can exercise these rights and access your data by contacting the Redeemer Central administrator, using the details in Section 14.

You also have the right to lodge a complaint with the Information Commissioner’s Office. Contact details in Section 14.

12. Third Party Data Processors and Recipients

All of our data processors are listed below. We only use these processors with your consent or with a legal basis.

Apple	Google	Squarespace	O2
Band	Instagram	SquareUp	Virgin Media
Dropbox	MailChimp	Twitter	
Facebook	Planning Centre	Whatsapp	

All of our data recipients are listed below:

HMRC	Co-operative Bank	UHY-UK Accountants
NEST Pension Scheme	TLT Solicitors	

Please note that these processors and recipients may use sub-processors. Details of those sub-processors should be requested directly.

13. Further Processing and Policy Review

If we wish to use your personal data for a new purpose, not covered by this Data Protection Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

This Policy will be reviewed in March 2021.

14. Contact Details

14.1. Redeemer Central

To exercise all relevant rights, queries or complaints please in the first instance contact our administrator, Megan Joyce at:

Redeemer Central
101 Donegall St
Belfast
BT1 2FJ

or by email at:

admin@redeemercentral.com

14.2. Information Commissioner's Office

You have the right to complain to the Information Commissioner's Office. The office can be contacted on:

028 9027 8757

or via email:

ni@ico.org.uk

or at:

The Information Commissioner's Office – Northern Ireland

3rd Floor
14 Cromac Place,
Belfast
BT7 2JB