#### Introduction

Charis Communications is committed to the protection of the privacy of all our partners and friends, be they individuals or organizations. Your individual or your organization's privacy is really important to us and we understand how important it is to you. Our aim is to be as clear and open as possible about what we do with your personal data and why we do it.

Definitions we use in this privacy notice

- "Charis Communications", includes Charis Communications and its projects including: Dr. Hugh Osgood's teaching and academic activities both international and local, School of Biblical Studies for Leaders, School of Biblical Studies Franchise, Audio, and On-line Distance learning programmes, Master of Divinity programme, and YouthVids.com which are accessed online through a web browser, or by using our mobile applications.
- "you", "your Organisation" means your church, charity or other type of organization that, as a partner or friend has donated financially or requested information and/or contact. In this relationship between us, yourself or your organisation should be considered the Data Subject as defined within the context of the GDPR and UK data protection law.
- "us", "we" and "our" refer to Charis Communications. In the relationship between us, Charis Communications should be considered the Data Controller as defined within the context of the General Data Protection Regulation (GDPR) and UK data protection law. This means we decide how your personal data is processed and for what purposes.
- **"Partner"**, an individual or organization who has made a recordable voluntary financial contribution at least once in the previous 24 months.

#### How do we use your information?

When using any of our websites, the personal information we collect might include your IP address, what pages you may have visited on our website and when you accessed them (as part of our analytics report). Our sites only use cookies to improve your experience and are not used for targeted advertising purposes.

When you first sign up as a Partner, you are required to provide basic contact information (about yourself and/or your organization). The contact details you provide are used solely to communicate with you.

We comply with our 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.

In the interests of transparency and to be as clear as possible, we've set out the specific information we may collect about you when you sign up as a Partner, how we keep your information confidential and secure, and how you can access your information if you need to at the end of this privacy policy.

# What is our lawful basis for using your information?

We have various scenarios under which we may use your information, and for each we have identified a lawful basis, as described below:

- Contract applies:
  - If you have donated financially processing is necessary to perform and manage the contract in terms of necessary auditing and HMRC requirements including Gift Aid.
- Legitimate interest applies:
  - Where your Partnership has ended (from a Charis Communications point of view, such would be the case after a full 24 months without contact from yourself or your organization or any financial contributions). We will opt you out of all communication and not contact you after your Partnership has ended; unless you contact us or have requested we contact you at a later date. However, we will retain your contact details for internal financial and statistical reporting purposes.
  - Where you sign-up for a training event and we communicate with you about that event, both before the event, and in follow up after the event.
  - Where you have engaged with us at an exhibition or event, or you have approached us independently for information about Charis Communications. We will only use your contact details to respond to your enquiry.
  - Where we need to communicate with you about: -
    - A technical issue or bug within Charis Communications' websites or apps that may affect you,
    - Any security-related matter,
    - For good governance and accounting, analysis and developing statistics.
- Legal obligation applies:
  - When you exercise your rights under data protection law and related disclosures.
  - For maintaining and reporting financial accounting information for up to six (6) years from the end of the tax year in which a financial transaction was processed.
- Consent applies:
  - Where you have voluntarily subscribed to Charis Communications' mailing list and explicitly consented to receiving our emails. You can unsubscribe from this list at any time using the unsubscribe link in the footer of those periodic emails.

# Sharing your information

The information we hold about you and/or your organization will be treated as strictly confidential and we will only share your data with third parties with your prior consent, or unless required to do so by law.

# How secure is your information?

We take security very seriously and will do everything within our power to keep your information safe. Only authorised staff members will have access to your data and all online services are password protected and encrypted.

# How long do we keep your information?

We keep data in accordance with the guidance set out by the GDPR. We endeavour to maintain only data that is relevant, accurate and up to date. You are responsible to inform Charis Communications of any changes or corrections of any and all data held by Charis Communications. We have internal processes to periodically review the data we hold and delete data that is no longer relevant to our purpose for processing.

#### Your rights and your information

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

- Access to your information: You have the right to request a copy of the personal information about you that we hold.
- **Correcting your information:** We want to make sure that your personal information is accurate, complete and up to date and you may ask us to correct any personal information about you that you believe does not meet these standards.
- **Deletion of your information:** You have the right to ask us to delete personal information about you where:
  - you consider that we no longer require the information for the purposes for which it was obtained or that we no longer need to retain it in accordance with our statutory obligations;
  - you have validly objected to our use of your personal information see 'Objecting to how we may use your information' below;
  - o our use of your personal information is contrary to law or our other legal obligations.
- **Objecting to how we may use your information:** Where we use your personal information to perform tasks carried out in the public interest then, if you ask us to, we will stop using that personal information unless there are overriding legitimate grounds to continue.
- Restricting how we may use your information: In some cases, you may ask us to restrict how we use your personal information. This right might apply, for example, where we are checking the accuracy of personal information about you that we hold or assessing the validity of any objection you have made to our use of your information. The right might also apply where there is no longer a basis for using your personal information but you do not want us to delete the data. Where this right is validly exercised, we may only use the relevant personal information with your consent, for legal claims or where there are other public interest grounds to do so.
- Withdrawing consent using your information: Where we use your personal information with your consent you may withdraw that consent at any time and we will stop using your personal information for the purpose(s) for which consent was given. Please contact us in

any of the ways set out in the 'Contact information and further advice' section if you wish to exercise any of these rights.

• Lodging a complaint: If you feel we have used your information incorrectly or without lawful basis, or you dispute our lawful basis, you have the right to lodge a complaint with the Information Commissioner's Office (ICO).

# Further processing

If we wish to use your information for a new purpose, not covered by this Privacy Notice, then we will provide you with a new notice explaining the new use prior to starting the processing and setting out the relevant purposes and legal basis for processing. Where and whenever necessary, we will seek your prior consent to the new processing.

# Our contact details

We can provide you with access to your personal data at any time. We ask that requests are made in writing to The Data Protection Officer, Charis Communications, St. Paul's House, Edison Road, Bromley, BR2 0EP, or by email to contact@chariscommunications.org

If you have a data protection, security or privacy-related question or complaint, please contact Charis Communications by email in the first instance, where we will do our best to assist you or resolve an issue.

# Full disclosure

# Information we may collect about you/your organization

What we use this information for

Organisation name	Used to create a Partnership profile in Charis Communications for your named organization.
Principal contact first and last name	To be used in any and all contacts with your organization.
Contact email address	An email address is required in order to communicate with you. Communications will also include information about Charis Communications' teaching/training events, periodic updates about new products, progress and ministry reports, and confirm changes requested to your personal data held by Charis Communications.
Contact telephone number	Optional: Either a landline or mobile/cell number. We do not usually communicate by telephone/sms unless you have requested a call back, or if we need to contact you quickly about your Partnership for any reason.

Physical address	Required by law for Gift Aid records and audits, also used occasionally for communication.
Gift Aid Status	All completed and signed Gift Aid paperwork will be retained at Charis Communications for the period specified in law.
Other information we maintain about your organization	
If your organization signs up for a teaching/training event	When your organization or individuals within your organization are signed-up for a training event, the sign-up details are used solely to communicate with your organization about the event, both before and in follow up to the event. Sign-up details are retained for financial accounting and audit purposes. We do not use your event sign-up details for any other marketing purpose.