

Privacy Notice

How we use your information

This privacy notice tells you what to expect when the Commission Apostolic Trust (Commission) collects personal information. It applies to information we collect about:

- People who use our services, e.g. who attend an event, subscribe to our newsletter, purchase resources or attend our training
- Visitors to our website
- Complainants and other individuals in relation to a data protection or subject access request or enquiry
- Job applicants and our current and former employees
- Short-term mission team applicants

Your privacy is important to us. We are committed to safeguarding the privacy of your information. We do all that we can to ensure that the data we hold is accurate, adequate, relevant and not excessive.

Whenever we collect information from you, we will make it clear which information is required in order to provide you with the information or service you have requested. We store your information securely on our systems, we restrict access to those who have a need to know, and we train our staff in handling the information securely. Commission is the Data Controller for any personal data you provide to us.

We have a lawful basis for processing this personal information under Legitimate Interests.

Event bookings

We may need to share your personal data with our processing partners such as Merchant Service Providers or Email/Text Service Providers who are contracted to assist us with the booking of your tickets – known as Sub-Processors. Commission is responsible under the UK Data Protection Act (2018)/GDPR to ensure that any Sub-Processor we contract are fully compliant with law and will also act to ensure the safety and confidentiality of your personal data. We will always ask for your consent to use your data in this way, whenever you book tickets with us.

Finally, we also use an organisation QFlow to manage our event check-in procedures. Their privacy statement can be found <u>here</u>.

Financial information

Commission uses a number of third party companies as part of financial management. These are kept to a minimum and all comply with strict industry standards. We therefore do not store any donor debit/credit card information. These organisations are as follows; privacy policies for each may be found by clicking on the organisation name:

Xero is the finance management application used by Commission.

Stripe is used to capture all debit/credit card transactions including one off ticket costs and payment by instalments. Stripe provide us with the online e-commerce functions that allows us to sell our products and services to you via the Commission website. PayPal may store your credit card data. It is encrypted through the Payment Card Industry Data Security Standard (PCI-DSS). Your purchase transaction data is stored only as long as is necessary to complete your purchase transaction. After that is complete, your purchase transaction information is deleted.

All direct payment gateways adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, MasterCard, American Express and Discover.

PayPal is used in certain circumstances to process some donations via PayPal Giving Fund.

ChurchSuite is used in certain circumstances to process some event bookings.

Infoodle integrates gift aid claims with our finance application Xero and links directly with HMRC.

We bank with HSBC who process all supplier, staff and contract payments.

For pledges with Gift Aid your details are shared with HMRC for processing.

For reporting purposes we use G-Accon for processing.

Training

We process personal data of all applicants for our training courses. This is stored on Monday.com. We do not hold this longer than necessary.

Online Magazine

As Commission is a charity committed to good stewardship we are constantly looking for ways to use the resources we have more effectively. E-mail is a very effective way of communicating with our supporters. We will not send large emails and where we use images in the email we will host them elsewhere saving space in your inbox. We send out a termly magazine (with links to an online version, hosted on Issuu, and a pdf version) for which specific consent is given at the point of subscription.

You can unsubscribe from our emails at any time; directions on how to do this will be contained within the email.

We use a third party provider, Squarespace, to deliver our termly magazines. For more information, please see Squarespace's <u>privacy notice</u>.

Visitors to our website - use of cookies by Commission

Like many websites, Commission uses tiny computer files called 'cookies' to aid your browsing experience. We only use essential cookies that enable the functioning of our website(s), and do not identify you through the use of cookies or information sent by your computer, except where you have asked us to remember your details.

You can read more about how we use cookies in our Cookie Notice.

People who contact us via social media

We use Facebook Business Suite and Twitter to manage our social media interactions. If you send us a private or direct message via social media the message will not be stored outside of the host organisation's server (i.e. Facebook/Twitter) and will not be shared with any other organisations.

People who email us

We will monitor any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law.

People who make a complaint to us

Commission tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

We are happy to provide any additional information or explanation needed. Any requests for this should be sent to the address below.

When we receive a complaint from a person we make up a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint.

We will only use the personal information we collect to process the complaint and to check on the level of service we provide.

We will keep personal information contained in complaint files in line with our retention policy. This means that information relating to a complaint will be retained for two years from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

Similarly, where enquiries are submitted to us we will only use the information supplied to us to deal with the enquiry and any subsequent issues and to check on the level of service we provide.

Job applicants, current and former Commission employees

Commission is the data controller for the information you provide during the recruitment process unless otherwise stated. If you have any queries about the process or how we handle your information please contact us at office@commission.global for the Commission Recruitment privacy notice.

Short-term mission team applicants

Occasionally, Commission will arrange short-term mission teams, which necessitates the processing of personal data, for flight and accommodation bookings. Specific consent is obtained for the processing of data for short-term teams.

Requesting access to your personal data (Subject Access Requests)

We try to be as open as it can be in terms of giving people access to their personal information. Individuals can find out if we hold any personal information by making a 'subject access request' under the Data Protection Act 2018. If we do hold information about you we will:

- give you a description of it;
- tell you why we are holding it;
- tell you who it could be disclosed to; and
- let you have a copy of the information in an intelligible form.

To make a request to Commission for any personal information we may hold you need to put the request in writing to the address provided below or call 01202 612130 to discuss further.

If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone.

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office at https://ico.org.uk/concerns/.

Your rights

Under the GDPR 2018 and Data Protection Act 2018, you have rights as an individual which you can exercise in relation to the information we hold about you.

You have the right to:

- object to the processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and

• claim compensation for damages caused by a breach of the Data Protection regulations.

You can also get further information on:

- agreements we have with other organisations for sharing information;
- circumstances where we can pass on personal data without consent for example, to prevent and detect crime;
- our instructions to staff on how to collect, use and delete personal data; and
- how we check that the information we hold is accurate and up to date.

For further information on how your information is used, how we maintain the security of your information and your rights to access the information we hold on you please contact our Data Protection Compliance Manager as above.

Data accuracy

If we do hold information about you, you can ask us to correct any mistakes by contacting the Commission office at office@commission.global

Links to other websites

This privacy notice does not cover the links within this site linking to other websites. We encourage you to read the privacy statements on the other websites you visit.

Changes to this privacy notice

We keep our privacy notice under regular review. This privacy notice was last updated on 5th October 2021.

How to contact us

If you want to request information about our privacy policy you can email us or write to:

Commission Apostolic Trust Ltd. Citygate Centre 138a Holdenhurst Road Bournemouth BH8 8AS