

## Okehampton Street Pastors Privacy Notice (Internal)

### 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 information alone or in conjunction with any other information.
2. Your information/personal data will be held by Okehampton Street Pastors (the local initiative). You can contact the local initiative as a data controller and for any data protection enquires by post by writing to:  
  
Chairman  
Okehampton Street Pastors  
21 Brandize Park, Okehampton, EX20 1EQ  
  
By email at okehampton@streetpastors.org.uk and by telephone on 01837 53944.
3. The local initiative is part of a wider network of 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 information that we hold with them so that they can carry out their responsibilities in our community. The network of local initiatives 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 the local initiative 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 information 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 local initiative's 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 manage your role as a volunteer, trustee, management committee member or employee;
  - e. to process a donation that you have made (including Gift Aid information);
  - f. to maintain our records and accounts;
  - g. to keep you notified of changes to the service that we provide, events or personnel within the local initiative;
  - h. to seek your comments or views;
  - i. to process applications for a role;
  - j. to share your contact details with Ascension Trust as necessary for the management of your role within the local initiative's network or the wider Ascension Trust network;
  - k. for legal, personnel, administrative and management purposes, to enable us to meet our legal obligations, eg to pay employees, monitor performance, pay expenses;
  - l. to process sensitive personal data, eg about health, in order to take decisions about your fitness or ability for your role with the local initiative;
  - m. to process sensitive personal data about racial or ethnic origins in order to monitor compliance with equal opportunity legislation;
  - n. to carry out checks with the Disclosure and Barring Service as necessary for your role;
  - o. in order to comply with legal requirements and obligations to third parties;
6. We may process the following information:
  - 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. Non-financial identifiers such as passport numbers, driving licence numbers, tax payer ID number, tax reference codes, and national insurance number.
  - e. 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.
  - f. Financial information such as salary, record of earnings, tax code, tax and benefits contributions, expenses claimed, amounts insured and amounts claimed.
  - g. Other operational personal data created, obtained, or otherwise processed in the course of the local initiative carrying out its activities including, but not limited to, recordings of telephone conversations, IP addresses and website visit histories, logs of visitors, incident logs, injuries and insurance claims.
  - h. Other employee data (not already covered) relating to your role with the local initiative including emergency contact information, gender, date of birth, performance management information, immigration status, citizenship, retirement date, employment references and personal biographies.
  - i. The data we process will likely include sensitive personal data because as a Christian organisation our volunteers are in the main Christian, which 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, data for the purpose of uniquely identifying a natural person, and data concerning health.

- j. The local initiative may also process criminal records and other judicial records.
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 process your application for a role with the local initiative, and if appointed, to assist you in fulfilling your role with the local initiative including administrative support or if processing is necessary for compliance with a legal obligation. Whilst exercising our legitimate interest we will always take into account your interests, rights and freedoms. As a religious organisation we are also permitted to process information about your religious beliefs to administer your role within the local initiative.
8. 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. It is likely that we will need to share your data with Ascension Trust as the umbrella body for local initiatives. We may also need to share your contact details with other individuals within the local initiative in order to facilitate your role. We may share your personal data with your local church leader for the purpose of your pastoral care.
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 retain your personal data for as long as you remain in your role, or any other role with the local initiative where the information may be required and for a period of time after any role with the organisation ceases, in line with our Data Retention Policy. Elements of your personal data may be retained beyond this initial retention period 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. In general, we will endeavour to keep data only for as long as we need it and we will delete it when it is no longer needed
14. As a person whose personal data the local initiative holds (a data subject) you have the following rights:
- The right to be informed of your rights as a data subject through this privacy notice.
  - The right of access to the information the local initiative holds on you.
  - The right to correct the information we hold on you.
  - The right to erase the information we hold on you.
  - The right to restrict processing of your personal data
  - 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 the local initiative at any time; however please note that if you withdraw your consent it may result in your being unable to continue your role within the organisation.
17. The provision of your personal data is part of a process you have entered with the local initiative to facilitate your role within the local initiative. If you withdraw your personal data, this may result in you being unable to continue in your role.
18. The local initiative 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.
19. 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/](http://www.ico.org.uk/concerns/handling/)

20. If you consent to being contacted by Okehampton Street Pastors, please tick the boxes below indicating how we can contact you. Please tick all means of contact that you consent to below. PLEASE NOTE WE CAN ONLY CONTACT YOU BY THE MEANS INDICATED WHERE YOU HAVE INDICATED:

Post      Email      Phone      SMS      WhatsApp

Name (BLOCK CAPITALS):

Signature:

Date: