



# Edge Church Privacy Policy – UK

## Introduction

Through being part of the Edge family and your involvement in ministry, we will learn things about each other. Some of this information is personal and sensitive. On our part, we want to assure you that we do the best we can to protect your privacy. Depending on your role in ministry, you may have access to other people's personal information and we expect that you will help us in protecting their privacy also.

We manage your personal information to ensure that you have a reasonable expectation of privacy and control over any information we store about you. We recognise the rights of people to keep their personal information private. Our Privacy Policy covers our use of personal information that you provide, and we collect or hold, because of your involvement.

We comply with the laws which describe mandatory levels of protection for your personal information and support your rights as described in the laws. In the laws, Edge Church International (ECI) is described as a "data controller". This means that we store and control access to personal information and we must to tell you certain information when processing your personal information.

If you have any queries about this Privacy Policy or how we use your personal information, please contact our **UK Data Protection Lead** who can be contacted at:

### Data Protection

Edge Church International  
1160 Park Avenue  
Aztec West, Bristol  
BS32 4TF

or using email at [privacyUK@edgechurch.com](mailto:privacyUK@edgechurch.com)

If you continue to minister with us as part of our family, or use our websites, you are agreeing to comply with and be bound by the following terms and conditions of use, which govern the way we manage your personal information. If you disagree with any part of this policy, please do not provide personal information and do not use the services of our websites without discussing it with us.

## What is personal information?

When we say personal information, we mean anything relating to a living individual who can be identified from that information. Identification can be by the information alone or when combined with any other information in our possession.



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## Where do we collect personal information?

We collect personal information from you in several ways. You may share it with us in person, on paper, or using online forms within our systems. We will only store information you share with us with your permission. We use an online service provider to help manage information for church administration and pastoral care to our church family and the wider community. You may be provided with access to a personal user account, which you can use to provide us with information (including personal information), update preferences and access options to allow the booking of events and recording attendance. This system helps us stay in touch with you and it allows you to provide us with information in a quick and efficient way.

## What sort of information do we store?

Depending on your involvement in church life and the kinds of pastoral care we provide, we may collect and store:

- your mobile phone number;
- your email address;
- your marital status;
- your age and gender;
- information about your family;
- your education and employment;
- your role(s) within the church;
- attendance at meetings, events and training;
- outcomes of a DBS check;
- information about your use of our systems (e.g. when you have logged in, what pages you visited);
- information we collect and record as part of pastoral care activity (this could include anything you tell us unless you tell us not to store it);
- donations to the church; and
- effectively, any information you provide to us.

The law defines some “Special Categories” of sensitive personal information. We may also collect, store and use the following Sensitive Categories of personal information:

- information about your health, including any mental or physical conditions that you notify us about;
- your religious beliefs;
- your racial origin;
- your sexual orientation; and
- criminal records.

For details of how we handle your information for methods of payments made via debit/credit cards or reimbursements made directly to your bank account, please see our Payment Card Information Security Policy. You can request this from the **UK Data Protection Lead**.



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## Personal information we collect automatically

When you use our Services, we may collect certain information automatically such as:

- Your IP address (the unique information your device uses to identify itself to the Internet);
- Your activity while using our Services (including times and dates of visits);
- Information about your location.

## Cookies

A cookie is a small file of information which our website gives to your browser and your browser places on your computer's hard drive. Cookies store information such as details of your visits to our website. Cookies allow websites to respond to you as an individual and let us tailor our website to your needs, likes, and dislikes by remembering information about you. We use cookies to help us to provide you with a better website.

Each website will inform you of the cookies used. You can control the use and recording of cookies through settings in your browser. Most computers automatically accept cookies but you can change your settings so that you will not receive cookies and you can also delete existing cookies from your computer. You will need to refer to the help pages of your specific browser to identify how this is done.

If you do change your settings, you may find that some parts of our website will not function properly. If you do not adjust your settings, your computer will allow your browser to store cookies from our website on your computer. To find out how to delete cookies or adjust their settings please visit <http://www.allaboutcookies.org/>.

## Emails

Please be aware that email is not a secure delivery method. If you chose to send us information via email or post, we cannot guarantee the security of this information until it is delivered to us.

## How we use your personal information

The law defines ways we are permitted to use your personal information. Each of these is listed below with a short explanation of how it relates to Edge Church.

### Where it is necessary for our legitimate interests

The law defines a term called "legitimate interests". These are simply functions which form part of our normal operations. The law specifically states that the church may use "legitimate interests" to process personal information relating to its congregation. We consider this is the most appropriate condition for us to administer your affiliation to our church as you would reasonably expect that we would have to process your personal information, so you can take full advantage of being part of our church family.

The following are examples of how we may use your information as legitimate interests for administration purposes:

- to set up your church account on our inhouse church database if required;
- so that we can keep a record of your attendance at church, and at other events and meetings;



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- to provide you with pastoral care and other support that you have requested, and we believe would be helpful to you; and
- to organise volunteers and put together rosters so our ministry can function.

## **Where you have consented to us using your personal information**

Examples of how we may use your information with consent:

- we may ask for your consent to send marketing communications out to you, including information about our events and other marketing materials; or
- we may also ask for consent where you have given us information as part of our pastoral care and asked us to use it for a certain purpose.

## **Where we need to perform a contract we have entered into with you**

Examples of how we may use your information to comply with a contract that we have entered into with you:

- to buy tickets for events or register for a camp, retreat or conference;
- if you hire the church building;
- to administer our infrastructure (such as troubleshooting, data analysis, research);
- to tell you about changes to our website, software or services that will affect your use of these services; and
- to help us (or our software developers) improve our services.

## **Where we need to comply with a legal obligation**

Examples of how we may use your information to fulfil a legal obligation:

- keeping financial records for gift aid purposes;
- to prevent and detect fraud; and
- to protect children and vulnerable adults.

## **Special Categories of Personal Information**

“Special Categories” of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information.

We may process special categories of personal information in the following circumstances:

- in limited circumstances, with your explicit consent recorded in writing (e.g. where you tell us information to obtain support and pastoral care from us – for example, this could relate to physical or mental health concerns);
- where we need to carry out our legal obligations (e.g. ensure DBS checking is done where appropriate);
- where it is needed in the public interest (e.g. marriage records);
- where it is needed in connection with our Children and Vulnerable Adults’ Protection Policy; and
- less commonly, we may process this type of information where it is needed to protect your interests (or someone else’s interests) and you are not capable of giving your consent, or where you have already made the information public.

In practice, we may use your sensitive personal information in the following ways:



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- to provide you with support and pastoral care;
- to help you access support and benefits if appropriate and requested by you;
- to organise attendance and involvement in church activities;
- to decide your suitability for roles in the church to protect yourself and others.

In all cases where we require consent, we will seek your written consent or record your consent in writing to allow us to process certain special categories of personal information. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your relationship with us that you agree to any request for consent from us.

Whilst information relating to children is not considered to be special category information, it is information that is given specific protection. Where the child is under the age of 13, we will always ask for the consent of the parents or person with legal responsibility before collecting and storing any personal information.

Where a child is 13 or over, then we may collect information from them directly; but we will (if we believe it to be appropriate in the circumstances) inform the parents or person with legal responsibility. We will tell the child at the time of signing up that we may inform their parents and we will only do this where it is appropriate and lawful to do so.

## Where we might share your personal information

We may share your information with certain parties including:

- the leadership of the church, pastoral care team and the prayer team so that they can provide you with support;
- team leaders and other team members you are involved with for rostering and communication purposes;
- other churches – if you request us to pass on your information either to them or from them (if you move, for example);
- support services and benefit providers (e.g. local authorities, your doctor);
- our software providers who need to access stored information to facilitate operation of our website;
- for website use information only, analytics and search engine providers who analyse information about your use of our website.

We do not sell or pass any of your personal information to any other organisations and/or individuals without your express consent. We do, however, engage several service providers who, within their usage terms, agree to keep our data private. We restrict the exposure of personal information to these service providers through internal processes and usage policies. Our service providers include:

- Microsoft – email and file storage;
- Google – email, file storage and analytics;
- Drop Box – file storage;



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- Images/ video on media platforms – Instagram, Facebook, Twitter, YouTube, Vimeo;
- WhatsApp – for communication with you and between teams;
- Mailchimp – emailing church updates;
- HSBC Bank – giving and payments; and
- Stripe – online giving and payments

We may also disclose your personal information if we are required by law, or to enforce or apply our terms of use. This includes exchanging information with other organisations such as HMRC, law enforcement agencies, fraud investigators and financial collection agencies.

Our websites may contain links to websites owned by other organisations. If you follow a link to another website, they will have their own privacy policies. We suggest that you check the policies of any other websites before giving them your personal information as we cannot accept responsibility for any other website or organisation.

## How we protect your personal information

The security of your personal information is important to us. We use technical and organisational measures to safeguard personal information and encryption technology where appropriate to enhance privacy and help prevent information security breaches.

We ensure all third parties who provide services to us have a contract requiring them to have appropriate technical, administrative and physical procedures in place to ensure that your information is protected against loss or misuse. All information you provide to us is stored on our secure servers or on secure servers operated by a third party. Information about our third-party providers can be found above.

We only hold your personal information for as long as necessary for the purposes for which we collected it.

We have a Retention Policy which lays down timescales for the retention of information. A copy of the Retention Policy is available from the **UK Data Protection Lead** on request.

## Your rights

You have the right to access information that we hold about you. If you wish to receive a copy of the information that we hold, please contact our **UK Data Protection Lead** using the details at the beginning of this document.

You can ask us at any time to change, amend or delete the information that we hold about you or ask us not to contact you with any further marketing information. You can also ask us to restrict the information that we process about you. You can request that we change, amend, delete your information or restrict our processing by contacting our **UK Data Protection Lead**.

You have a right to ask us to stop any automated decision making. We do not intentionally carry out such activities, but if you do have any questions or concerns we would be happy to discuss them with you. You have the right to request that your personal information is transferred by us to another



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organisation (this is called “data portability”). Please contact our **UK Data Protection Lead** with the details of what you would like us to do and we will try our best to comply with your request. It may not be technically feasible, but we will work with you to try and find a solution.

You have the right to object to us processing your personal information based on legitimate interests or the performance of a task in the public interest or exercise of official authority (including profiling); direct marketing (including profiling); and processing for purposes of scientific/historical research and statistics. Please contact us if you wish to object.

If you make a request to us under this Privacy Policy and you are unhappy with the response, you can ask for the request to be reviewed by the Campus Pastor who will do their best to try and resolve the issue.

If you have contacted the Campus Pastor and are still not happy with the result, then you have the right to complain to the Information Commissioner’s Office. They can be contacted as follows:

Website: [www.ico.org.uk](http://www.ico.org.uk)

Telephone: 03031 231 113

Address: Information Commissioner’s Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

## Changes to our Privacy Policy

We review our Privacy Policy at least annually to check that it accurately reflects how we deal with your information and may amend it if necessary. We invite you to check this document regularly to see the most up to date information. This Privacy Policy is effective from 25<sup>th</sup> May 2018 and is designed to protect your Personal Information and comply with the new General Data Protection Regulation (GDPR) as well as the existing Data Protection Act (DPA 2018).

We last updated this Privacy Policy on 9<sup>th</sup> September 2019.